

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----  
HICKEY FREEMAN TAILORED CLOTHING,  
INC.,

Plaintiff,

v.

Case No. 17 Civ 5754

CHARGEURS, S.A., LAINIÈRE DE (KPF)  
PICARDIE BC SAS, LAINIÈRE DE  
PICARDIE INC., LAINIÈRE DE  
PICARDIE (WUJIANG) TEXTILES CO.  
LTD., AND VERATEX LINING LTD.,  
Defendants.

-----

30(b)(6) DEPOSITION of VANESSA DEFAIT

June 18, 2018

New York, New York

Reported by:

Robin LaFemina

JOB NO. 21843

<p style="text-align: right;">Page 2</p> <p>1</p> <p>2</p> <p>3</p> <p>4 June 18, 2018</p> <p>5 9:14 a.m.</p> <p>6</p> <p>7 RULE 30(b)(6) DEPOSITION of</p> <p>8 CHARGEURS, S.A., by VANESSA DEFAIT, held at</p> <p>9 the offices of Loeb &amp; Loeb LLP, 345 Park</p> <p>10 Avenue, New York, New York, before Robin</p> <p>11 LaFemina, a Registered Professional</p> <p>12 Reporter, Certified LiveNote Reporter and</p> <p>13 Notary Public within and for the State of</p> <p>14 New York</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1</p> <p>2 A P P E A R A N C E S (C'td.)</p> <p>3</p> <p>4 FOR DEFENDANTS CHARGEURS S.A., LAINIÈRE DE</p> <p>5 PICARDIE BC SAS, LAINIÈRE DE PICARDIE INC.:</p> <p>6 FOX ROTHSCHILD, LLP</p> <p>7 2000 Market Street - 20th Floor</p> <p>8 Philadelphia, Pennsylvania 19103-3222</p> <p>9 BY: WILLIAM STASSEN, ESQ.</p> <p>10 TELEPHONE: 215.299.2000</p> <p>11 EMAIL: wstassen@foxrothschild.com</p> <p>12</p> <p>13 FOR DEFENDANTS VERATEX LINING LTD.:</p> <p>14 WILSON, ELSER, MOSKOWITZ, EDELMAN &amp; DICKER, LLP</p> <p>15 BY: ERIC NIEDERER, ESQ.</p> <p>16 1010 Washington Boulevard</p> <p>17 Stamford, Connecticut 06901</p> <p>18 TELEPHONE: 203-388-9100</p> <p>19 EMAIL: eric.niederer@wilsonelser.com</p> <p>20</p> <p>21 ALSO PRESENT:</p> <p>22 ERIC HEUBERGER, French Interpreter</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 3</p> <p>1</p> <p>2 A P P E A R A N C E S</p> <p>3</p> <p>4 FOR PLAINTIFF:</p> <p>5 LOEB &amp; LOEB LLP</p> <p>6 BY: FRANK D. D'ANGELO, ESQ.</p> <p>7 345 Park Avenue</p> <p>8 New York, New York 10154-1895</p> <p>9 TELEPHONE: 212-407-4189</p> <p>10 EMAIL: fdangelo@loeb.com</p> <p>11</p> <p>12 FOR DEFENDANTS CHARGEURS S.A., LAINIÈRE DE</p> <p>13 PICARDIE BC SAS, LAINIÈRE DE PICARDIE INC.:</p> <p>14 FOX ROTHSCHILD, LLP</p> <p>15 BY: CAROLINE A. MORGAN, ESQ.</p> <p>16 101 Park Avenue, Suite 1700</p> <p>17 New York, New York 10178</p> <p>18 TELEPHONE: 212-878-7900</p> <p>19 EMAIL: cmorgan@foxrothschild.com</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 5</p> <p>1</p> <p>2 ERIC HEUBERGER,</p> <p>3 called as a French Interpreter, having</p> <p>4 been first duly sworn by Robin</p> <p>5 LaFemina, a Notary Public within and</p> <p>6 for the State of New York, translated</p> <p>7 as follows:</p> <p>8 VANESSA DEFAIT,</p> <p>9 called as a Witness, having been first</p> <p>10 duly sworn by Robin LaFemina, a Notary</p> <p>11 Public within and for the State of New</p> <p>12 York, was examined and testified as</p> <p>13 follows:</p> <p>14 EXAMINATION BY</p> <p>15 MR. D'ANGELO:</p> <p>16 Q. State your name for the record,</p> <p>17 please.</p> <p>18 A. Vanessa Defait.</p> <p>19 Q. Where do you reside?</p> <p>20 A. 132 Rue Perronet, 92200</p> <p>21 Neuilly-Sur-Seine, France.</p> <p>22 Q. Good morning, Ms. Defait. How</p> <p>23 are you?</p> <p>24 A. Fine. Thank you.</p> <p>25 Q. My name is Frank D'Angelo, I</p>

<p style="text-align: right;">Page 6</p> <p>1                   Defait</p> <p>2   represent Hickey Freeman in this deposition,</p> <p>3   and I'm going to be asking you a number of</p> <p>4   questions today and potentially tomorrow. I</p> <p>5   want to start today just by going over some</p> <p>6   ground rules for the deposition.</p> <p>7         Does that sound all right with</p> <p>8   you?</p> <p>9         A.   Yes.</p> <p>10        Q.   Have you ever been deposed in</p> <p>11   the United States before?</p> <p>12        A.   Never.</p> <p>13        Q.   So this might be new to you, so</p> <p>14   that's why I'm going to go over some basics</p> <p>15   so you know what to expect today.</p> <p>16         We have a court reporter that's</p> <p>17   going to be taking down your responses to my</p> <p>18   questions. She'll need verbal responses, so</p> <p>19   when I ask you a question, I'll just ask you</p> <p>20   to give me a response verbally as opposed to</p> <p>21   shaking your head or nodding your head.</p> <p>22         Okay?</p> <p>23        A.   Okay.</p> <p>24        Q.   Very good.</p> <p>25         We have a translator that's</p>	<p style="text-align: right;">Page 8</p> <p>1                   Defait</p> <p>2         Is that fair with you?</p> <p>3         A.   Very well.</p> <p>4         Q.   Your attorney, Ms. Morgan, she</p> <p>5   may object to some of my questions over the</p> <p>6   course of the day. Usually that's just to</p> <p>7   record her objection for the record, and</p> <p>8   I'll ask that you answer my question even if</p> <p>9   she objects, with the exception that if she</p> <p>10   instructs you not to answer a question, then</p> <p>11   you don't have to.</p> <p>12        A.   That's fine.</p> <p>13        Q.   We can take breaks during the</p> <p>14   day. If you need a break or you need to use</p> <p>15   the washroom, or you just want to take five</p> <p>16   minutes and not be asked questions, please</p> <p>17   let me know or let your attorney know as well.</p> <p>18        A.   Fine.</p> <p>19        Q.   I will represent to you that the</p> <p>20   attorneys have discussed that we have allotted</p> <p>21   two days for your deposition, today and</p> <p>22   tomorrow. Will you be available through the</p> <p>23   end of the day tomorrow if necessary?</p> <p>24        A.   I'm available today and tomorrow</p> <p>25   until the end of the day. However, I do</p>
<p style="text-align: right;">Page 7</p> <p>1                   Defait</p> <p>2   going to be translating my questions and</p> <p>3   your answers. I ask that you please keep</p> <p>4   your voice up so that he can hear your</p> <p>5   responses.</p> <p>6         Okay?</p> <p>7        A.   Okay.</p> <p>8        Q.   And then I ask that we all wait</p> <p>9   until we stop speaking to -- before we give</p> <p>10   an answer, so if you can wait until I stop</p> <p>11   asking my question and the translator stops</p> <p>12   asking his or translating my question before</p> <p>13   you give an answer, it will just make it</p> <p>14   clearer for the record if we all wait for</p> <p>15   each other to speak.</p> <p>16        A.   That's fine.</p> <p>17        Q.   If I ask a question and you</p> <p>18   don't understand it, please let me know and</p> <p>19   I'll try to rephrase as best I can.</p> <p>20         Okay?</p> <p>21        A.   Very well.</p> <p>22        Q.   If I ask you a question and you</p> <p>23   don't ask me to rephrase or you don't say</p> <p>24   that you don't understand my question, then</p> <p>25   I'm going to assume you understand it.</p>	<p style="text-align: right;">Page 9</p> <p>1                   Defait</p> <p>2   have a plane to catch.</p> <p>3        Q.   And when is your plane tomorrow?</p> <p>4        A.   10:00.</p> <p>5        Q.   That's 10 p.m.; correct?</p> <p>6        A.   10 p.m.</p> <p>7        Q.   Is that yes, 10 p.m.?</p> <p>8        A.   Yes.</p> <p>9        Q.   And do you have any calls or</p> <p>10   meetings scheduled tonight that would</p> <p>11   require us to stop at a certain time?</p> <p>12        A.   No, I don't.</p> <p>13        Q.   We'll try to get you out of here</p> <p>14   at a reasonable time tonight.</p> <p>15         You understand that you've taken</p> <p>16   an oath to tell the truth today; correct?</p> <p>17        A.   That's right.</p> <p>18        Q.   And do you understand if you</p> <p>19   don't testify truthfully, that could open</p> <p>20   you up to potentially criminal or civil</p> <p>21   liability in the United States?</p> <p>22        A.   I understand.</p> <p>23        Q.   Are you aware of anything,</p> <p>24   Ms. Defait, that would prevent you from</p> <p>25   answering my questions truthfully today?</p>

Page 10	Page 12
<p>1 Defait</p> <p>2 A. No.</p> <p>3 Q. Excuse me for asking this, but</p> <p>4 do you have any medical conditions or have</p> <p>5 you taken any medication that would inhibit</p> <p>6 your ability to recall events or testify in</p> <p>7 any way today?</p> <p>8 A. No.</p> <p>9 Q. How old are you, Ms. Defait?</p> <p>10 A. 42 years old.</p> <p>11 Q. Where were you born?</p> <p>12 A. At Epinay-Sur-Seine in France.</p> <p>13 Q. And where do you currently live?</p> <p>14 A. In France.</p> <p>15 Q. Where in France?</p> <p>16 A. At Neuilly-Sur-Seine.</p> <p>17 Q. Do you speak English at all,</p> <p>18 Ms. Defait?</p> <p>19 A. What do you mean by speak English?</p> <p>20 Q. Do you speak any English, and,</p> <p>21 if so, how would you describe your level of</p> <p>22 proficiency in the English language?</p> <p>23 A. I speak English, I understand</p> <p>24 English, both written English and oral</p> <p>25 English, spoken English.</p>	<p>1 Defait</p> <p>2 far today in English that you have not</p> <p>3 understood?</p> <p>4 A. Yes, I did.</p> <p>5 Q. Did you know a translator was</p> <p>6 going to be here today?</p> <p>7 A. Yes, I did.</p> <p>8 Q. When did you first learn that?</p> <p>9 A. When my lawyer told me about it.</p> <p>10 Q. When was that?</p> <p>11 MS. MORGAN: And you can</p> <p>12 discuss, Ms. Defait, the time, but not</p> <p>13 any of the substance of the conversations</p> <p>14 with any lawyer at Fox Rothschild.</p> <p>15 THE WITNESS: Fine.</p> <p>16 Q. So when did you first learn</p> <p>17 there was going to be a translator here?</p> <p>18 A. If I remember correctly, it was</p> <p>19 less than a month ago.</p> <p>20 Q. Did you ask for a translator to</p> <p>21 be present at the deposition?</p> <p>22 A. No.</p> <p>23 Q. Do you know if someone else</p> <p>24 asked on your behalf for a translator to be</p> <p>25 present?</p>
Page 11	Page 13
<p>1 Defait</p> <p>2 Q. When did you first learn to</p> <p>3 speak or read English?</p> <p>4 A. In high school.</p> <p>5 Q. Approximately how old were you</p> <p>6 at the time?</p> <p>7 A. 16.</p> <p>8 Q. Do you conduct any business in</p> <p>9 the English language at your place of work,</p> <p>10 and by that I mean do you have business</p> <p>11 conversations in English, do you send</p> <p>12 e-mails or anything like that?</p> <p>13 A. Yes, I do.</p> <p>14 Q. And approximately how many days</p> <p>15 out of the week did you use English as part of?</p> <p>16 A. Regularly.</p> <p>17 Q. Would you say every day?</p> <p>18 A. It depends.</p> <p>19 Q. Would you say every other day?</p> <p>20 A. It depends on the subject I'm</p> <p>21 dealing with and who I'm speaking to.</p> <p>22 Q. Have you ever lived in the</p> <p>23 United States?</p> <p>24 A. No.</p> <p>25 Q. Have I said anything to you so</p>	<p>1 Defait</p> <p>2 A. No.</p> <p>3 Q. Do you currently work for</p> <p>4 Chargeurs?</p> <p>5 Strike that.</p> <p>6 Do you currently work for</p> <p>7 Chargeurs, S.A.?</p> <p>8 A. No.</p> <p>9 Q. What company do you work for, if</p> <p>10 any?</p> <p>11 A. Chargeurs Boissy.</p> <p>12 Q. What does that company do?</p> <p>13 A. It's a service company.</p> <p>14 Q. Just so the record is clear,</p> <p>15 could you spell Chargeurs Boissy, please?</p> <p>16 A. It's C-H-A-R-G-E-U-R-S and</p> <p>17 Boissy is B-O-I-S-S-Y.</p> <p>18 Q. Is there a corporate designation</p> <p>19 like S.A. or S.A.S., something like that?</p> <p>20 A. The company -- the legal name of</p> <p>21 the company is an S.A.R.L., Limited --</p> <p>22 THE INTERPRETER: What's that?</p> <p>23 I don't know the --</p> <p>24 MR. D'ANGELO: Responsibility I</p> <p>25 think she said.</p>

Page 14	Page 16
<p>1                   Defait</p> <p>2       A.   -- Limited Liability.</p> <p>3       MS. MORGAN: Eric, when you're</p> <p>4       saying something as the interpreter,</p> <p>5       could you say this is the interpreter</p> <p>6       talking?</p> <p>7       THE INTERPRETER: Sure.</p> <p>8       MS. MORGAN: So can you repeat</p> <p>9       your answer and then whatever comment</p> <p>10      you had?</p> <p>11      THE INTERPRETER: Okay.</p> <p>12      MR. D'ANGELO: Let me just reask</p> <p>13      the question. I think it will be</p> <p>14      clearer.</p> <p>15      THE INTERPRETER: Right.</p> <p>16      Q.   Does Chargeurs Boissy have any</p> <p>17      type of corporate designation?</p> <p>18      A.   Yes.</p> <p>19      Q.   What is it?</p> <p>20      A.   S.A.R.L.</p> <p>21      Q.   You mentioned Chargeurs Boissy</p> <p>22      is a service company. What type of services</p> <p>23      does it provide and to whom?</p> <p>24      A.   Chargeurs Boissy provides services</p> <p>25      to Chargeurs, S.A., also to Fitexin, also</p>	<p>1                   Defait</p> <p>2       A.   At Chargeurs Boissy, yes, I am.</p> <p>3       Q.   To the best of your knowledge,</p> <p>4       are there lawyers that work directly for</p> <p>5       Chargeurs, S.A.?</p> <p>6       A.   Yes.</p> <p>7       Q.   Approximately how many, if you</p> <p>8       know?</p> <p>9       A.   I know of one law firm.</p> <p>10      Q.   I guess let me rephrase my</p> <p>11      question. Do you know approximately how</p> <p>12      many attorneys are employed directly by</p> <p>13      Chargeurs, S.A. as in-house counsel?</p> <p>14      A.   No, I don't.</p> <p>15      Q.   Is there a more senior legal</p> <p>16      employee within the entire Chargeurs group</p> <p>17      to whom you report?</p> <p>18      A.   No.</p> <p>19      Q.   Is it fair to say you are the</p> <p>20      most senior legal personnel within the</p> <p>21      entire Chargeurs group?</p> <p>22      MS. MORGAN: Object to the form</p> <p>23      to the extent that Chargeurs group is</p> <p>24      ambiguous. You can answer if you</p> <p>25      understand.</p>
Page 15	Page 17
<p>1                   Defait</p> <p>2       Novacel, also to Senfa, also to Chargeurs</p> <p>3       World Eurasia.</p> <p>4       Q.   What services does it provide to</p> <p>5       Chargeurs, S.A.?</p> <p>6       A.   It provides legal, fiscal and</p> <p>7       financial advice and assistance.</p> <p>8       Q.   What services does it provide to</p> <p>9       Fitexin?</p> <p>10      A.   They are legal, fiscal and</p> <p>11      financial assistance and advice, especially</p> <p>12      on demand. That is when the activities of</p> <p>13      that company require these services.</p> <p>14      Q.   Does it provide any business or</p> <p>15      operational advice or services to either of</p> <p>16      those two companies?</p> <p>17      A.   No.</p> <p>18      Q.   Do you know approximately how</p> <p>19      many employees Chargeurs Boissy has?</p> <p>20      A.   I would say approximately 10 to</p> <p>21      15 people.</p> <p>22      Q.   What is your position there?</p> <p>23      A.   Head of legal affairs.</p> <p>24      Q.   Are you the senior-most legal</p> <p>25      officer within Chargeurs Boissy?</p>	<p>1                   Defait</p> <p>2       Q.   Do you understand what I mean by</p> <p>3       Chargeurs group?</p> <p>4       A.   I would like you to explain what</p> <p>5       you mean, your definition of Chargeurs group.</p> <p>6       Q.   Have you ever used the term</p> <p>7       Chargeurs group?</p> <p>8       A.   Yes.</p> <p>9       Q.   When you have used that term,</p> <p>10      what are you referring to?</p> <p>11      A.   When I refer to that, I am</p> <p>12      referring to Chargeurs, S.A. and its</p> <p>13      associated companies, that is, its</p> <p>14      subsidiaries.</p> <p>15      Q.   Okay. So let's go with that</p> <p>16      definition.</p> <p>17      Is there a more senior legal</p> <p>18      personnel within Chargeurs group above you?</p> <p>19      A.   There is in Chargeurs Boissy</p> <p>20      one single legal personnel, and in the</p> <p>21      subsidiaries I don't know the -- if there</p> <p>22      are any employees who fill a legal function.</p> <p>23      Q.   Who is the person you're</p> <p>24      thinking of within Chargeurs Boissy?</p> <p>25      A.   It's me.</p>

Page 18	Page 20
<p>1 Defait</p> <p>2 Q. So my question is: Is there any</p> <p>3 other attorney within the Chargeurs group</p> <p>4 that is senior to you or are you the single</p> <p>5 most senior personnel within the Chargeurs</p> <p>6 group?</p> <p>7 MS. MORGAN: Object to the form.</p> <p>8 You can answer the question.</p> <p>9 A. So I don't have anybody above</p> <p>10 me. There is no person ranked above me in</p> <p>11 Chargeurs Boissy that has a legal function.</p> <p>12 My boss is Joelle Fabre-Hoffmeister who is</p> <p>13 secretary general.</p> <p>14 Q. Can you spell that name for the</p> <p>15 record, please?</p> <p>16 A. It's Joelle, J-O-E-L-L-E, and</p> <p>17 the surname is F-A-B-R-E hyphen</p> <p>18 H-O-F-F-M-E-I-S-T-E-R.</p> <p>19 Q. His position is secretary general?</p> <p>20 A. Yes.</p> <p>21 Q. Of Chargeurs Boissy?</p> <p>22 A. No.</p> <p>23 Q. Of what?</p> <p>24 A. Chargeurs, S.A.</p> <p>25 Q. Why are you serving as the</p>	<p>1 Defait</p> <p>2 Q. Do you know why your boss named</p> <p>3 you as the corporate rep?</p> <p>4 MS. MORGAN: And to the extent</p> <p>5 that you can answer that without</p> <p>6 disclosing any attorney-client</p> <p>7 privileged communication or any work</p> <p>8 product, you can do so. Otherwise, I</p> <p>9 direct you not to answer.</p> <p>10 A. When she named me to do this,</p> <p>11 she didn't provide a reason, she didn't say</p> <p>12 what it was.</p> <p>13 Q. Did you ask her why?</p> <p>14 A. No, I didn't.</p> <p>15 Q. Do you know why she didn't</p> <p>16 select a business person as opposed to an</p> <p>17 attorney?</p> <p>18 MS. MORGAN: Objection to form.</p> <p>19 It calls for speculation. You can</p> <p>20 answer to the extent you have any</p> <p>21 personal knowledge.</p> <p>22 Q. Did you say to her in words or</p> <p>23 substance that a businessperson might be</p> <p>24 better to serve as a corporate rep?</p> <p>25 A. For which company?</p>
Page 19	Page 21
<p>1 Defait</p> <p>2 corporate rep for Chargeurs Boissy?</p> <p>3 THE INTERPRETER: The</p> <p>4 interpreter would like to ask a</p> <p>5 question. Corporate rep, sorry, so I</p> <p>6 can interpret it?</p> <p>7 MR. D'ANGELO: Representative of</p> <p>8 Chargeurs, S.A. for the purposes of</p> <p>9 this deposition.</p> <p>10 MS. MORGAN: I think you said</p> <p>11 the group.</p> <p>12 THE INTERPRETER: Chargeurs, S.A.?</p> <p>13 MR. D'ANGELO: Let me rephrase it.</p> <p>14 THE INTERPRETER: I'm not sure I</p> <p>15 understood it.</p> <p>16 MS. MORGAN: Okay.</p> <p>17 Q. Why are you serving as the</p> <p>18 corporate rep for Chargeurs, S.A. for the</p> <p>19 purposes of this deposition?</p> <p>20 A. I was named as the person to be</p> <p>21 the deponent in this deposition by Joelle</p> <p>22 Fabre-Hoffmeister on behalf of Chargeurs.</p> <p>23 Q. Do you know if anyone else was</p> <p>24 considered other than you?</p> <p>25 A. No.</p>	<p>1 Defait</p> <p>2 Q. For Chargeurs, S.A.</p> <p>3 MS. MORGAN: And I'll direct you</p> <p>4 not to answer that question because</p> <p>5 that's getting into work product in</p> <p>6 regards to this litigation, so I'll</p> <p>7 direct you not to answer.</p> <p>8 A. I will follow the advice of my</p> <p>9 attorney.</p> <p>10 MR. D'ANGELO: Let's mark the</p> <p>11 first exhibit please Chargeurs 1.</p> <p>12 (Chargeurs Exhibit 1, Amended</p> <p>13 Notice of Deposition, marked for</p> <p>14 identification, as of this date.)</p> <p>15 Q. Let me know when you've had a</p> <p>16 chance to look at that, Ms. Defait.</p> <p>17 (Witness reviewing document.)</p> <p>18 A. That's fine.</p> <p>19 Q. Have you seen that document before?</p> <p>20 A. Yes, I have.</p> <p>21 Q. It's the Notice of Chargeurs</p> <p>22 S.A.'s Deposition; isn't that right?</p> <p>23 A. Yes.</p> <p>24 Q. And you're the person designated</p> <p>25 to give that testimony today; correct?</p>



Page 22	Page 24
<p>1 Defait</p> <p>2 A. Yes.</p> <p>3 Q. And you understand that your</p> <p>4 testimony is binding on Chargeurs, S.A.;</p> <p>5 correct?</p> <p>6 A. Yes.</p> <p>7 Q. Did you do anything to prepare</p> <p>8 for today's deposition?</p> <p>9 A. Yes.</p> <p>10 Q. What did you do?</p> <p>11 A. I spoke with Caroline Morgan, I</p> <p>12 also reviewed certain documents related to</p> <p>13 Chargeurs, S.A. and I also spoke with Joelle</p> <p>14 Fabre-Hoffmeister specifically about the</p> <p>15 Chargeurs, S.A.</p> <p>16 Q. How many times did you meet with</p> <p>17 Ms. Morgan to prepare?</p> <p>18 MS. MORGAN: And I'll counsel</p> <p>19 you, Ms. Defait, that you can discuss</p> <p>20 the number of times, but not any of the</p> <p>21 substance of what we discussed.</p> <p>22 A. I spoke twice on the phone with</p> <p>23 Caroline Morgan and I had one face to face</p> <p>24 meeting with her.</p> <p>25 Q. When were the phone calls?</p>	<p>1 Defait</p> <p>2 A. About half an hour.</p> <p>3 Q. You say you reviewed documents</p> <p>4 with Ms. Morgan; is that right?</p> <p>5 A. That's right.</p> <p>6 Q. And you're aware that certain</p> <p>7 documents have been exchanged by the parties</p> <p>8 throughout this lawsuit?</p> <p>9 A. I suppose so.</p> <p>10 Q. Do you know if any of the</p> <p>11 documents you reviewed with Ms. Morgan are</p> <p>12 documents that have not been exchanged by</p> <p>13 the parties?</p> <p>14 A. When you talk about the parties</p> <p>15 to this procedure, you're talking about</p> <p>16 Hickey Freeman and who else?</p> <p>17 Q. Hickey Freeman, Veratex, LP</p> <p>18 Inc., LP BC, LP Wujiang.</p> <p>19 MS. MORGAN: And, again, I</p> <p>20 counsel you, Ms. Defait, that you can</p> <p>21 respond to the question, however,</p> <p>22 without any of the substance of our</p> <p>23 conversations concerning any documents.</p> <p>24 A. So your question is that if the</p> <p>25 documents that I reviewed with Ms. Morgan</p>
Page 23	Page 25
<p>1 Defait</p> <p>2 A. Last Thursday and Friday.</p> <p>3 Q. How long did the first call last</p> <p>4 for?</p> <p>5 A. About two hours.</p> <p>6 Q. Second phone call?</p> <p>7 A. About an hour and a half.</p> <p>8 Q. How about the in-person meeting?</p> <p>9 A. Approximately seven hours.</p> <p>10 Q. How many times did you speak</p> <p>11 with your boss -- I'm just going to call her</p> <p>12 Joelle because it's easier for me -- how</p> <p>13 many times did you speak with Joelle to</p> <p>14 prepare for this deposition?</p> <p>15 MS. MORGAN: And, again, I'll</p> <p>16 counsel you, Ms. Defait, that you can</p> <p>17 discuss the number of times, but not</p> <p>18 the substance of your conversations.</p> <p>19 A. Once before leaving for New York</p> <p>20 and once this morning.</p> <p>21 Q. How long was the conversation</p> <p>22 before leaving for New York for?</p> <p>23 A. No more than 20 minutes.</p> <p>24 Q. And this morning, how long did</p> <p>25 that conversation last for?</p>	<p>1 Defait</p> <p>2 are also documents that were exchanged with</p> <p>3 Veritext, LP Inc., LP BC, LP Wujiang and</p> <p>4 Hickey Freeman?</p> <p>5 Q. Correct.</p> <p>6 A. No. It's only a supposition</p> <p>7 that I could possibly make.</p> <p>8 Q. Do you know if you reviewed any</p> <p>9 documents that are being withheld from</p> <p>10 Hickey Freeman because of attorney-client</p> <p>11 privilege?</p> <p>12 A. Please could you repeat the</p> <p>13 question?</p> <p>14 Q. Do you want me to rephrase or</p> <p>15 just repeat?</p> <p>16 A. Just to repeat it so that I</p> <p>17 understand the question properly.</p> <p>18 Q. Sure.</p> <p>19 MR. D'ANGELO: Would you mind.</p> <p>20 (Whereupon, the requested</p> <p>21 portion of the record was read back</p> <p>22 by the reporter.)</p> <p>23 MR. D'ANGELO: Can the</p> <p>24 translator retranslate that, please.</p> <p>25 MS. MORGAN: You can answer the</p>

Page 26	Page 28
<p>1 Defait</p> <p>2 question yes or no, but not discuss any</p> <p>3 of the substance of those documents if</p> <p>4 any exist.</p> <p>5 A. No, I don't know.</p> <p>6 MS. MORGAN: And throughout this</p> <p>7 deposition, Ms. Defait, nobody here</p> <p>8 wants you to guess, so if you're</p> <p>9 unclear or you don't know, please state</p> <p>10 so. Earlier I believe you said --</p> <p>11 MR. D'ANGELO: Can you not give</p> <p>12 instructions to the witness during the</p> <p>13 deposition and on the record --</p> <p>14 MS. MORGAN: Earlier you said --</p> <p>15 MR. D'ANGELO: -- that's totally</p> <p>16 improper.</p> <p>17 MS. MORGAN: Earlier --</p> <p>18 MR. D'ANGELO: Note my objection</p> <p>19 to this, please.</p> <p>20 MS. MORGAN: -- you said it</p> <p>21 would be a supposition, so to the</p> <p>22 extent that you can answer the</p> <p>23 questions, please do so.</p> <p>24 MR. D'ANGELO: I will ask</p> <p>25 counsel to refrain from coaching the</p>	<p>1 Defait</p> <p>2 Q. What about Angela Chan?</p> <p>3 A. No.</p> <p>4 Q. You understand when I say LP</p> <p>5 Wujiang, I mean Lainière De Picardie (Wujiang)</p> <p>6 Textiles Co. Ltd.?</p> <p>7 A. Yes.</p> <p>8 Q. So I'm just going to call them</p> <p>9 Wujiang.</p> <p>10 A. That's fine.</p> <p>11 Q. Did you speak to anybody from</p> <p>12 Wujiang to prepare for today's deposition?</p> <p>13 A. No.</p> <p>14 Q. Did you speak to Manuel Tse?</p> <p>15 A. No.</p> <p>16 Q. Did you speak to Chuck Lai to</p> <p>17 prepare for today's deposition?</p> <p>18 A. No.</p> <p>19 Q. Did you speak to Dong Gui to</p> <p>20 prepare for today's deposition?</p> <p>21 A. No.</p> <p>22 Q. Did you speak to Tina Chan to</p> <p>23 prepare for today's deposition?</p> <p>24 A. No.</p> <p>25 Q. Did you review any transcripts</p>
Page 27	Page 29
<p>1 Defait</p> <p>2 witness during the deposition. It is</p> <p>3 completely improper. And note my</p> <p>4 objection to counsel's statement.</p> <p>5 MS. MORGAN: You can translate</p> <p>6 that.</p> <p>7 THE INTERPRETER: Okay.</p> <p>8 MS. MORGAN: Is there a question</p> <p>9 pending? I don't think so.</p> <p>10 Q. That conversation with Joelle,</p> <p>11 the two conversations with Joelle, anyone</p> <p>12 else at those conversations between you and</p> <p>13 he -- you and she, excuse me?</p> <p>14 A. No.</p> <p>15 Q. Did you speak with Francois</p> <p>16 Rousseau to prepare for the deposition today?</p> <p>17 A. Yes.</p> <p>18 Q. When was that?</p> <p>19 A. This morning.</p> <p>20 Q. For how long?</p> <p>21 A. Less than a quarter of an hour.</p> <p>22 Q. What about Fran Natale?</p> <p>23 A. No.</p> <p>24 Q. What about Bernard Vossart?</p> <p>25 A. No.</p>	<p>1 Defait</p> <p>2 of depositions taken earlier in this case to</p> <p>3 prepare?</p> <p>4 A. No.</p> <p>5 Q. Did you review the Complaint?</p> <p>6 A. No.</p> <p>7 Q. Did you review any other</p> <p>8 documents that may have been filed with the</p> <p>9 court in this case?</p> <p>10 A. No; except this Notice of</p> <p>11 Deposition.</p> <p>12 Q. Why didn't you speak with anyone</p> <p>13 from Wujiang?</p> <p>14 MS. MORGAN: Objection to the</p> <p>15 extent that it calls for you to</p> <p>16 disclose any communications with Fox</p> <p>17 Rothschild. You can answer otherwise.</p> <p>18 A. I represent the interest of</p> <p>19 Chargeurs, S.A. and not LP Wujiang, so I didn't</p> <p>20 deem it necessary to speak to LP Wujiang.</p> <p>21 Q. Are you aware that you're here</p> <p>22 to give testimony on behalf of Chargeurs, S.A.</p> <p>23 regarding matters within the possession or</p> <p>24 knowledge of Wujiang?</p> <p>25 A. Yes, I'm aware of that.</p>



<p style="text-align: right;">Page 30</p> <p>1                   Defait</p> <p>2           Q.    You didn't think it would be a</p> <p>3   good idea to speak with somebody from Wujiang?</p> <p>4           MS. MORGAN: Objection. Asked</p> <p>5   and answered.</p> <p>6           Q.    It wasn't asked and answered,</p> <p>7   different question, but go ahead.</p> <p>8           A.    Could you repeat the question?</p> <p>9           Q.    You didn't think it would be a</p> <p>10   good idea to speak to someone from Wujiang?</p> <p>11          A.    I didn't ask myself that question.</p> <p>12          Q.    You didn't consider it?</p> <p>13          A.    No.</p> <p>14          Q.    Where is Chargeurs, S.A. located?</p> <p>15          A.    In Paris.</p> <p>16          Q.    Address, please?</p> <p>17          A.    112 Avenue Kleber, 75116 Paris.</p> <p>18          Q.    Does Chargeurs, S.A. have any</p> <p>19   other offices?</p> <p>20          A.    No.</p> <p>21          Q.    Where is Chargeurs Boissy</p> <p>22   located?</p> <p>23          A.    At 112 Avenue Kleber, 75116 Paris.</p> <p>24          Q.    Same address?</p> <p>25          A.    Yes.</p>	<p style="text-align: right;">Page 32</p> <p>1                   Defait</p> <p>2           MR. D'ANGELO: Strike that.</p> <p>3           Q.    Do you know when you were served</p> <p>4   with the Complaint? And by that, I mean</p> <p>5   Chargeurs, S.A.</p> <p>6           MS. MORGAN: Objection to the</p> <p>7   form. I believe the translator</p> <p>8   translated that as received, but the</p> <p>9   questioner noted served, which is</p> <p>10   different. To the extent that that</p> <p>11   calls for a legal conclusion, the</p> <p>12   witness is not testifying on legal</p> <p>13   matters. To the extent that you</p> <p>14   understand the question, you can answer</p> <p>15   it.</p> <p>16          THE INTERPRETER: I'm just</p> <p>17   checking a word, checking my French</p> <p>18   here.</p> <p>19          A.    I don't remember the exact date</p> <p>20   when Chargeurs received the Complaint.</p> <p>21          MS. MORGAN: I'd like to take a</p> <p>22   short break.</p> <p>23          MR. D'ANGELO: Sure.</p> <p>24          (Whereupon, a brief recess was</p> <p>25   taken.)</p>
<p style="text-align: right;">Page 31</p> <p>1                   Defait</p> <p>2           Q.    Same offices?</p> <p>3           A.    Yes.</p> <p>4           Q.    When did Chargeurs hire legal</p> <p>5   counsel, outside legal counsel in connection</p> <p>6   with the lawsuit?</p> <p>7           A.    When Chargeurs, S.A. was first</p> <p>8   notified.</p> <p>9           Q.    First notified of what?</p> <p>10          A.    When we received the Complaint.</p> <p>11          Q.    By Complaint, do you mean the</p> <p>12   document that was filed with the court or</p> <p>13   something else?</p> <p>14          A.    I'm not sure we're referring to</p> <p>15   the same document. Are there two different</p> <p>16   documents?</p> <p>17          Q.    What document are you referring</p> <p>18   to?</p> <p>19          A.    We were -- we were served the</p> <p>20   Complaint, and then that's when we decided</p> <p>21   to hire external counsel.</p> <p>22          Q.    Do you know when the Complaint</p> <p>23   was filed?</p> <p>24          MS. MORGAN: Do you mean with</p> <p>25   the court?</p>	<p style="text-align: right;">Page 33</p> <p>1                   Defait</p> <p>2   CONTINUED BY MR. D'ANGELO:</p> <p>3           Q.    Ms. Defait, before the break I</p> <p>4   asked you when Chargeurs hired outside</p> <p>5   counsel and you said after Chargeurs was</p> <p>6   served with a copy of the Complaint and I</p> <p>7   asked you when and you said you didn't know.</p> <p>8           After speaking with counsel, do</p> <p>9   you want to change any of that testimony?</p> <p>10          A.    Yes.</p> <p>11          Q.    What would you like to change</p> <p>12   about it?</p> <p>13          A.    I have a more specific idea of</p> <p>14   the date when we hired that lawyer.</p> <p>15          Q.    By that lawyer, you mean Fox</p> <p>16   Rothschild or somebody else?</p> <p>17          A.    Yes. Fox Rothschild.</p> <p>18          MR. D'ANGELO: Let the record</p> <p>19   reflect the witness answered in English,</p> <p>20   please.</p> <p>21          Q.    So what's the date?</p> <p>22          A.    May 2017.</p> <p>23          Q.    Do you remember what time in May?</p> <p>24          A.    No.</p> <p>25          Q.    Was it in the beginning of the</p>

Page 34	Page 36
<p>1                   Defait</p> <p>2   month or more toward the end of the month?</p> <p>3       A.   I don't know.</p> <p>4       Q.   Does Chargeurs, S.A. have a</p> <p>5   board of directors?</p> <p>6       A.   What do you mean by board of</p> <p>7   directors?</p> <p>8       Q.   What's your understanding of</p> <p>9   what a board of directors is?</p> <p>10      A.   It's a question of the</p> <p>11   translation. I think you're referring to a</p> <p>12   conseil d'administration, board of directors.</p> <p>13      Q.   When I say board of directors, I</p> <p>14   mean people who don't necessarily need to be</p> <p>15   employed by the company, but they can be</p> <p>16   outside directors that discuss strategy.</p> <p>17      Do you understand that?</p> <p>18      A.   The answer is yes.</p> <p>19      Q.   And approximately how many times</p> <p>20   each year does that board meet?</p> <p>21      A.   It depends on the years.</p> <p>22      Q.   How about in 2017? When did the</p> <p>23   board meet that year?</p> <p>24      A.   Approximately nine times.</p> <p>25      Q.   Did you attend any of those</p>	<p>1                   Defait</p> <p>2   issue that Hickey Freeman had raised with</p> <p>3   respect to Chargeurs Interlining?</p> <p>4       A.   The answer is no.</p> <p>5       Q.   Chargeurs also has a management</p> <p>6   committee of people that work within the</p> <p>7   Chargeurs group; isn't that right?</p> <p>8       A.   What do you mean by management</p> <p>9   of the group?</p> <p>10      Q.   Is there some sort of management</p> <p>11   or executive committee within the Chargeurs,</p> <p>12   S.A.?</p> <p>13      A.   There is a management committee</p> <p>14   within Chargeurs, S.A.</p> <p>15      Q.   How many times did they meet in</p> <p>16   2017?</p> <p>17      A.   I don't know.</p> <p>18      Q.   Did you attend any of those</p> <p>19   meetings?</p> <p>20      A.   No.</p> <p>21      Q.   Do you know if prior to May of</p> <p>22   2017, any management committee meetings</p> <p>23   involved any discussions of Hickey Freeman</p> <p>24   or the issues Hickey Freeman raised with</p> <p>25   respect to Chargeurs Interlining?</p>
Page 35	Page 37
<p>1                   Defait</p> <p>2   meetings?</p> <p>3       A.   Yes.</p> <p>4       Q.   All of them?</p> <p>5       A.   Yes.</p> <p>6       Q.   How many times did that board of</p> <p>7   directors meet prior to May of 2017, during</p> <p>8   the year 2017?</p> <p>9       A.   Before May 2017?</p> <p>10      Q.   Yes.</p> <p>11      A.   Three times, if I remember</p> <p>12   correctly.</p> <p>13      Q.   Did the board discuss Hickey</p> <p>14   Freeman at all during those three meetings?</p> <p>15      A.   No.</p> <p>16      Q.   Do you remember any meetings in</p> <p>17   May of 2017, any Board meetings?</p> <p>18      A.   No, I do not remember.</p> <p>19      Q.   When is the next meeting you can</p> <p>20   remember after May 2017?</p> <p>21      A.   July 2017.</p> <p>22      Q.   At any point in time prior to</p> <p>23   that July 2017 meeting of the board of</p> <p>24   directors, was there any discussion at those</p> <p>25   board meetings of Hickey Freeman or of the</p>	<p>1                   Defait</p> <p>2       A.   I know that there was no</p> <p>3   discussion of Hickey Freeman at the</p> <p>4   management committee meetings.</p> <p>5       Q.   At none of them?</p> <p>6       A.   That's right.</p> <p>7       Q.   Neither before nor after May</p> <p>8   2017? Is that what you're saying?</p> <p>9       A.   That's right.</p> <p>10      Q.   And how do you know that?</p> <p>11      A.   I asked the question.</p> <p>12      Q.   Was there any discussion of</p> <p>13   Hickey Freeman at any of the board of</p> <p>14   directors meetings after May of 2017? And</p> <p>15   that's a yes or no question.</p> <p>16      A.   Was there any discussion by the</p> <p>17   board of directors after May 2017?</p> <p>18      Q.   Correct.</p> <p>19      A.   No.</p> <p>20      Q.   I just want to make sure the</p> <p>21   question for the record is clear. My question</p> <p>22   was whether at any point after May 2017 at</p> <p>23   the meetings of the board of directors for</p> <p>24   Chargeurs, S.A., has there been any</p> <p>25   discussion at all about Hickey Freeman or</p>

Page 38	Page 40
<p>1 Defait</p> <p>2 about this litigation at all? Yes or no?</p> <p>3 A. No.</p> <p>4 Q. Do you know what fusible</p> <p>5 interlining is, Ms. Defait?</p> <p>6 A. Yes.</p> <p>7 Q. Other than this lawsuit, has</p> <p>8 Chargeurs, S.A. been involved in any other</p> <p>9 lawsuits involving fusible interlining?</p> <p>10 MS. MORGAN: By involved, do you</p> <p>11 mean a named party?</p> <p>12 MR. D'ANGELO: Let's start with</p> <p>13 that, yes, named party.</p> <p>14 A. Chargeurs, S.A. has never been</p> <p>15 involved in any litigation involving</p> <p>16 interlining.</p> <p>17 Q. Has any other company within the</p> <p>18 Chargeurs group?</p> <p>19 A. Yes.</p> <p>20 Q. Which ones?</p> <p>21 A. Intissel, I-N-T-I-S-S-E-L.</p> <p>22 Q. What's the full name of that</p> <p>23 company, corporate designation, please?</p> <p>24 A. Intissel S.A.S. I would like to</p> <p>25 rectify that. Today it is constituted as an</p>	<p>1 Defait</p> <p>2 fabric, something else.</p> <p>3 A. It was a non-woven product.</p> <p>4 Q. Where was that litigation?</p> <p>5 A. In France.</p> <p>6 Q. What was the name of the party</p> <p>7 or parties that started that lawsuit?</p> <p>8 A. Canele Industrei.</p> <p>9 Q. Can you spell that, please?</p> <p>10 A. I think the spelling of Canele</p> <p>11 is C-A-N-E-L-E followed by Industrei,</p> <p>12 I-N-D-U-S-T-R-E-I, and there might or might</p> <p>13 not be an S at the end of Industrei.</p> <p>14 Q. What were the results of that</p> <p>15 litigation?</p> <p>16 A. The litigation filed by Canele</p> <p>17 Industrei was dismissed.</p> <p>18 Q. Did Intissel have to pay</p> <p>19 anything in connection with that lawsuit</p> <p>20 being dismissed to the extent you can</p> <p>21 remember anything?</p> <p>22 A. Intissel paid the legal fees,</p> <p>23 but if I remember correctly, it didn't make</p> <p>24 any payment to the Chargeurs group or party.</p> <p>25 Q. Other than Intissel, has any</p>
Page 39	Page 41
<p>1 Defait</p> <p>2 S.A.R.L.</p> <p>3 Q. So Intissel S.A.R.L.; correct?</p> <p>4 A. That's right.</p> <p>5 Q. But at the time of the litigation</p> <p>6 is may have been called Intissel S.A.S.?</p> <p>7 A. That's right.</p> <p>8 Q. When was that?</p> <p>9 A. It goes back to a number of</p> <p>10 years ago, to 2006.</p> <p>11 Q. What was the subject matter of</p> <p>12 the lawsuit?</p> <p>13 A. A defective product.</p> <p>14 Q. What was the allegedly defective</p> <p>15 product?</p> <p>16 A. The product code was SD75, if I</p> <p>17 remember correctly.</p> <p>18 Q. That's a product code for a</p> <p>19 fusible interlining; is that right?</p> <p>20 A. I don't know.</p> <p>21 Q. Do you know if it was some other</p> <p>22 kind of product?</p> <p>23 A. When you say kind of product,</p> <p>24 what do you mean? What kind of product?</p> <p>25 Q. Meaning interlining, canvas,</p>	<p>1 Defait</p> <p>2 other company of the Chargeurs group been</p> <p>3 involved in any lawsuit involving allegedly</p> <p>4 defective products?</p> <p>5 THE INTERPRETER: Sorry. I got</p> <p>6 distracted. I heard most of the</p> <p>7 question.</p> <p>8 MR. D'ANGELO: It should be in</p> <p>9 there.</p> <p>10 THE INTERPRETER: Thank you.</p> <p>11 A. Are you referring to all the</p> <p>12 business units, to all the divisions?</p> <p>13 Q. Correct.</p> <p>14 A. Yes.</p> <p>15 Q. Which ones?</p> <p>16 A. Novacel Korea.</p> <p>17 Q. Any others?</p> <p>18 A. Boston Tapes.</p> <p>19 Q. Can you spell that, please?</p> <p>20 A. B-O-S-T-O-N T-A-P-E-S.</p> <p>21 Q. That's a company within the</p> <p>22 Chargeurs group?</p> <p>23 A. It's a company that is a</p> <p>24 subsidiary of Novacel, S.A.</p> <p>25 Q. Any others besides Novacel Korea</p>

Page 42	Page 44
<p>1 Defait</p> <p>2 and Boston Tapes?</p> <p>3 A. No.</p> <p>4 I just want to make a little</p> <p>5 rectification with regard to Boston Tapes</p> <p>6 because you mentioned litigation. There was</p> <p>7 a subpoena.</p> <p>8 Q. So Boston Tapes was not sued in</p> <p>9 that case?</p> <p>10 A. No.</p> <p>11 Q. Novacel Korea was though?</p> <p>12 A. Yes.</p> <p>13 Q. Do you know what the product was</p> <p>14 that was involved in that case?</p> <p>15 A. Temporary protective film.</p> <p>16 Q. Do you know the result of that</p> <p>17 litigation?</p> <p>18 A. As a result of the litigation</p> <p>19 between Novacel Korea?</p> <p>20 Q. Yes.</p> <p>21 A. Novacel Korea was found</p> <p>22 responsible.</p> <p>23 Q. Who filed that case against</p> <p>24 Novacel Korea?</p> <p>25 A. A client called Korvan.</p>	<p>1 Defait</p> <p>2 of legal at the company?</p> <p>3 A. Which company?</p> <p>4 Q. Boissy.</p> <p>5 MS. MORGAN: Objection to the</p> <p>6 form. You can answer.</p> <p>7 A. On behalf of Chargeurs Boissy,</p> <p>8 since 2010.</p> <p>9 Q. Did you work in the Chargeurs</p> <p>10 group prior to that?</p> <p>11 A. Yes.</p> <p>12 Q. What did you do prior to that?</p> <p>13 A. I was the head of legal affairs</p> <p>14 for Chargeurs Entoilage.</p> <p>15 Q. How long were you there as head</p> <p>16 of legal affairs?</p> <p>17 A. From February 2005 to September</p> <p>18 2010.</p> <p>19 Q. Did you have another position</p> <p>20 within the Chargeurs group prior to that time?</p> <p>21 A. No.</p> <p>22 Q. When did you get your law degree?</p> <p>23 A. Which degree?</p> <p>24 Q. How many law degrees do you have?</p> <p>25 THE INTERPRETER: First I'm going</p>
Page 43	Page 45
<p>1 Defait</p> <p>2 Q. Spell it, please, Ms. Defait.</p> <p>3 A. K-O-R-V-A-N.</p> <p>4 Q. How much did Novacel Korea have</p> <p>5 to pay in connection with that case, if you</p> <p>6 know? I am excluding attorneys' fees now.</p> <p>7 A. I don't remember the exact</p> <p>8 amount as the litigation was in local</p> <p>9 currency, but it was approximately 300,000</p> <p>10 euros.</p> <p>11 Q. When was that case resolved?</p> <p>12 A. In 2017.</p> <p>13 Q. Other than Intissel and Novacel</p> <p>14 Korea, have any other companies within the</p> <p>15 Chargeurs group ever been party to a lawsuit</p> <p>16 in connection with an allegedly defective</p> <p>17 product?</p> <p>18 A. Not as far as I can recall.</p> <p>19 Q. How about Wujiang?</p> <p>20 A. I'm not aware of it.</p> <p>21 Q. Lainière de Picardie BC?</p> <p>22 A. No. I'm not aware of any.</p> <p>23 Q. Lainière de Picardie Corporate?</p> <p>24 A. I'm not aware of any.</p> <p>25 Q. How long have you been the head</p>	<p>1 Defait</p> <p>2 to interpret as best to my ability.</p> <p>3 A. An undergrad in law and a</p> <p>4 master's degree in law.</p> <p>5 THE INTERPRETER: Is that okay?</p> <p>6 A. I don't know the equivalents in</p> <p>7 the United States.</p> <p>8 Q. Your master's degree in law,</p> <p>9 when was that?</p> <p>10 A. In 1999.</p> <p>11 Q. Your undergrad law degree?</p> <p>12 MS. MORGAN: Objection to the</p> <p>13 form. You can answer.</p> <p>14 A. It's a three-tiered degree for a</p> <p>15 total of four years and the last year is the</p> <p>16 maitrise.</p> <p>17 THE INTERPRETER: The</p> <p>18 interpreter has translated maitrise as</p> <p>19 master's.</p> <p>20 Q. So the last year of that, was</p> <p>21 the last year of that four-year program 1999?</p> <p>22 A. Yes. Out of the four years, yes.</p> <p>23 Q. Chargeurs, S.A., is that a</p> <p>24 publicly owned company?</p> <p>25 A. Yes, it is. It is quoted on the</p>

Page 46	Page 48
<p>1 Defait</p> <p>2 stock market.</p> <p>3 Q. Do you know who its largest</p> <p>4 shareholder is?</p> <p>5 A. Yes.</p> <p>6 Q. Who is that?</p> <p>7 A. The main shareholder is Columbus</p> <p>8 Holding.</p> <p>9 Q. What's that, Columbus Holding?</p> <p>10 A. It's an investment fund.</p> <p>11 Q. Do you know approximately how</p> <p>12 many shareholders Chargeurs, S.A. has?</p> <p>13 A. No.</p> <p>14 Q. What does Chargeurs, S.A. do?</p> <p>15 A. Chargeurs, S.A. is a company</p> <p>16 listed on the stock market and it is -- it</p> <p>17 is a holding company.</p> <p>18 Q. A holding company for what?</p> <p>19 A. It manages the shares in the</p> <p>20 context of the activity.</p> <p>21 Q. What do you mean by managing</p> <p>22 shares?</p> <p>23 A. That means it owns shares.</p> <p>24 Q. Of what?</p> <p>25 A. It owns shares in Senfa, it owns</p>	<p>1 Defait</p> <p>2 Entoilage S.A.S.</p> <p>3 Q. Was it once known as Chargeurs</p> <p>4 Entoilage, S.A.?</p> <p>5 A. That's right.</p> <p>6 Q. When did it change?</p> <p>7 A. Recently. Yes, at the end of</p> <p>8 2017, or the beginning of 2018. I don't</p> <p>9 have the exact date. They didn't change</p> <p>10 name.</p> <p>11 Q. You said it became S.A.S.;</p> <p>12 correct?</p> <p>13 A. They changed the corporate name.</p> <p>14 Q. Yes. Why did they change the</p> <p>15 corporate name?</p> <p>16 A. The corporate name is more</p> <p>17 flexible in terms of governance.</p> <p>18 Q. What does that mean?</p> <p>19 A. Chargeurs, S.A. had -- used to</p> <p>20 have a board of directors. Now it has a</p> <p>21 surveillance committee, a monitoring</p> <p>22 committee -- a supervisory board, and S.A.</p> <p>23 is a stricter designation according to</p> <p>24 French law than S.A.S. is.</p> <p>25 MR. D'ANGELO: Let's mark the</p>
Page 47	Page 49
<p>1 Defait</p> <p>2 shares in Chargeurs Interlining, it owns</p> <p>3 shares in Chargeurs Protective Film, it owns</p> <p>4 shares in Chargeurs Wool Eurasia, and it</p> <p>5 also -- also in some holding companies that</p> <p>6 don't have any particular operations,</p> <p>7 activity.</p> <p>8 You said that Chargeurs -- in</p> <p>9 the case of Chargeurs Protective Film, you</p> <p>10 used the name of protective film, but in</p> <p>11 terms of its legal name, you have to use the</p> <p>12 French title, which is Chargeurs Film de</p> <p>13 Protection.</p> <p>14 Q. And that you was addressed to</p> <p>15 the translator; correct? Was that a</p> <p>16 statement directed to the translator or --</p> <p>17 A. Yes. That's right.</p> <p>18 Q. And the translator translated</p> <p>19 one of the companies you mentioned as</p> <p>20 Chargeurs Interlining. Is the name of that</p> <p>21 company Chargeurs Entoilage?</p> <p>22 A. Yes, that's right.</p> <p>23 Q. Chargeurs Entoilage, S.A.;</p> <p>24 correct?</p> <p>25 A. Today it is called Chargeurs</p>	<p>1 Defait</p> <p>2 next exhibit, please, Chargeurs 2.</p> <p>3 (Chargeurs Exhibit 2,</p> <p>4 Registration Document 2017, marked for</p> <p>5 identification, as of this date.)</p> <p>6 MS. MORGAN: Are you done with</p> <p>7 this?</p> <p>8 MR. D'ANGELO: Yes.</p> <p>9 Q. Have you seen that document</p> <p>10 before, Ms. Defait?</p> <p>11 A. Yes.</p> <p>12 Q. What is it?</p> <p>13 A. It's the reference document for</p> <p>14 Chargeurs, S.A.</p> <p>15 Q. I will represent to you this was</p> <p>16 accessed from a website <a href="http://www.chargeurs.fr">www.chargeurs.fr</a>.</p> <p>17 Is it true that a French version</p> <p>18 of this document was filed with the French</p> <p>19 government?</p> <p>20 A. No. This document was not filed</p> <p>21 with the French government.</p> <p>22 Q. If you can turn to the second</p> <p>23 page of the document, please. Do you see</p> <p>24 the paragraph at the bottom left-hand corner</p> <p>25 of the page?</p>



Page 50	Page 52
<p>1 Defait</p> <p>2 It says, and I'll quote, the</p> <p>3 French version of this registration document</p> <p>4 was filed with French Financial Markets</p> <p>5 Authority, the AMF, under the number</p> <p>6 R.18-006 on March 23, 2018, pursuant to</p> <p>7 Article 212-13 of the AMF's general</p> <p>8 regulations.</p> <p>9 Do you see that, Ms. Defait?</p> <p>10 A. Yes, I do.</p> <p>11 Q. Is that true?</p> <p>12 A. Yes, it is.</p> <p>13 Q. What is the AMF?</p> <p>14 A. It's the body that oversees the</p> <p>15 financial markets.</p> <p>16 Q. Is it a government authority?</p> <p>17 A. No.</p> <p>18 Q. What is it then?</p> <p>19 A. It's an independent administrative</p> <p>20 body.</p> <p>21 Q. Does it have authority to</p> <p>22 sanction bodies that file with it?</p> <p>23 A. Yes. They have the authority to</p> <p>24 sanction bodies that are quoted on the stock</p> <p>25 market.</p>	<p>1 Defait</p> <p>2 A. That's right.</p> <p>3 Q. Anything else?</p> <p>4 A. Section 7.2, Section 7.3.</p> <p>5 Q. Those sections relate to a</p> <p>6 report of the board of directors and direct</p> <p>7 resolution submitted to the annual general</p> <p>8 meeting; correct?</p> <p>9 A. That's right.</p> <p>10 Q. Anything else?</p> <p>11 A. No.</p> <p>12 Q. In addition to the portions that</p> <p>13 you drafted, did you have responsibility for</p> <p>14 reviewing any portions of this document before</p> <p>15 it was filed with AMF?</p> <p>16 A. I was asked to read through the</p> <p>17 reference document; yes.</p> <p>18 Q. The entire document?</p> <p>19 A. Yes.</p> <p>20 Q. And if you had found something</p> <p>21 in there that was false, would you have</p> <p>22 corrected it?</p> <p>23 A. Indeed I would have shared what</p> <p>24 I found with Joelle Fabre-Hoffmeister.</p> <p>25 Q. Did you in fact make any</p>
Page 51	Page 53
<p>1 Defait</p> <p>2 Q. Are you aware of what the</p> <p>3 harshest sanction available to that body is?</p> <p>4 A. No, I don't.</p> <p>5 Q. Does it have authority to delist</p> <p>6 companies from the stock market?</p> <p>7 A. I don't know their roles.</p> <p>8 Q. In your role as head of legal,</p> <p>9 do you have any role, or with respect to</p> <p>10 filing a version of this document with the</p> <p>11 AMF?</p> <p>12 A. Yes.</p> <p>13 Q. What role do you play in filing</p> <p>14 this document with the AMF?</p> <p>15 A. To draft certain sections of the</p> <p>16 reference document.</p> <p>17 Q. Can you give me some answers of</p> <p>18 which sections you had responsibility for</p> <p>19 drafting?</p> <p>20 A. Yes.</p> <p>21 Q. You can point me to portions of</p> <p>22 the Table of Contents if that's easier.</p> <p>23 A. Corporate governance.</p> <p>24 Q. That's the section that begins</p> <p>25 at page 77; correct?</p>	<p>1 Defait</p> <p>2 corrections to any portions that you reviewed</p> <p>3 that you thought were false or inaccurate?</p> <p>4 A. False or inaccurate? No.</p> <p>5 Q. Any other types of changes?</p> <p>6 A. The correction of some spelling</p> <p>7 mistakes.</p> <p>8 MR. D'ANGELO: Let's go off the</p> <p>9 record for a moment.</p> <p>10 (Whereupon, a brief recess was</p> <p>11 taken.)</p> <p>12 Q. Ms. Defait, if you could turn to</p> <p>13 page 16 of the registration statement, please.</p> <p>14 MS. MORGAN: You said 16?</p> <p>15 MR. D'ANGELO: Yes. Page 16.</p> <p>16 THE INTERPRETER: 15?</p> <p>17 MR. D'ANGELO: 16.</p> <p>18 THE INTERPRETER: I see. 16.</p> <p>19 Q. The first sentence of the page</p> <p>20 says: Chargeurs is a global manufacturing</p> <p>21 and servicing group with leading positions</p> <p>22 in the markets for temporary industrial</p> <p>23 service protection, garment interlinings,</p> <p>24 technical textiles and premium quality wool.</p> <p>25 Do you see that, Ms. Defait?</p>



Page 54	Page 56
<p>1 Defait</p> <p>2 A. Yes.</p> <p>3 Q. Then the next sentence starts</p> <p>4 with the phrase our four business units.</p> <p>5 Do you see that?</p> <p>6 A. Yes.</p> <p>7 Q. And then below that there are</p> <p>8 four business units listed in different colors.</p> <p>9 Do you see that?</p> <p>10 A. Yes.</p> <p>11 Q. And one of them is Chargeurs</p> <p>12 Fashion Technologies; is that right?</p> <p>13 A. That's right.</p> <p>14 Q. And when it says our four</p> <p>15 business units, what does the our refer to?</p> <p>16 (Witness reviewing document.)</p> <p>17 A. I am just rereading the sentence.</p> <p>18 Q. Sure.</p> <p>19 (Witness reviewing document.)</p> <p>20 A. That refers to Chargeurs.</p> <p>21 Q. When you say Chargeurs, do you</p> <p>22 mean Chargeurs, S.A.?</p> <p>23 A. In this context, I understand</p> <p>24 Chargeurs is referring to the group.</p> <p>25 Q. So in this page, it's noting</p>	<p>1 Defait</p> <p>2 the form?</p> <p>3 A. Yes, that's right. It's a</p> <p>4 Chargeurs group.</p> <p>5 MR. D'ANGELO: What was wrong</p> <p>6 with the form, Caroline?</p> <p>7 MS. MORGAN: It was ambiguous if</p> <p>8 you were referring to the prior</p> <p>9 testimony concerning the group.</p> <p>10 Q. The sentence goes on to say:</p> <p>11 The group is organized around a lean head</p> <p>12 office that oversees four business lines.</p> <p>13 Do you see that?</p> <p>14 (Witness reviewing document.)</p> <p>15 A. Yes, I see that sentence.</p> <p>16 Q. And one of the business lines</p> <p>17 that's listed is Chargeurs Fashion</p> <p>18 Technologies; is that right?</p> <p>19 A. Yes.</p> <p>20 Q. And is that true, that statement?</p> <p>21 A. It all depends on how you</p> <p>22 interpret that sentence. What is your</p> <p>23 interpretation?</p> <p>24 Q. I'm just asking you if as</p> <p>25 stated, if that's a true statement as it</p>
Page 55	Page 57
<p>1 Defait</p> <p>2 that Chargeurs Fashion Technologies is one</p> <p>3 business unit in the Chargeurs group?</p> <p>4 A. That's right.</p> <p>5 Q. If you can flip to page 52,</p> <p>6 please.</p> <p>7 Do you see it says Internal</p> <p>8 Control Procedures at the top of the page?</p> <p>9 A. Yes.</p> <p>10 Q. And I just want to direct your</p> <p>11 attention to the paragraph in the middle of</p> <p>12 the page in the left column that says Scope</p> <p>13 of Internal Control.</p> <p>14 Do you see that?</p> <p>15 A. Yes, I see.</p> <p>16 Q. In the sentence that follows, it</p> <p>17 starts with the word the group.</p> <p>18 Do you see that? Do you see</p> <p>19 that?</p> <p>20 A. Yes, I see that.</p> <p>21 Q. Does that refer to the Chargeurs</p> <p>22 group?</p> <p>23 MS. MORGAN: Objection to the</p> <p>24 form. You can answer.</p> <p>25 MR. D'ANGELO: What's wrong with</p>	<p>1 Defait</p> <p>2 reads on the page.</p> <p>3 A. Can you translate into French</p> <p>4 the exact terms as they are given on this</p> <p>5 page?</p> <p>6 MR. D'ANGELO: Please.</p> <p>7 (Interpreter translating.)</p> <p>8 A. This sentence is true insofar as</p> <p>9 oversee is supervision, in terms of</p> <p>10 supervision meaning obtaining information</p> <p>11 from all four divisions, but I would like to</p> <p>12 look further for more context.</p> <p>13 (Witness reviewing document.)</p> <p>14 Q. Are you ready?</p> <p>15 A. Yes.</p> <p>16 Q. Anything you want to change to</p> <p>17 your statement?</p> <p>18 A. No.</p> <p>19 Q. When it says the group is</p> <p>20 organized around a lean head office, where</p> <p>21 is that lean head office located?</p> <p>22 A. In Paris.</p> <p>23 Q. Is that the office you gave</p> <p>24 earlier on Avenue Kleber?</p> <p>25 A. Yes.</p>

15 (Pages 54 to 57)

Page 58	Page 60
<p>1                   Defait</p> <p>2           Q.    So the office where Chargeurs,</p> <p>3   S.A. is located?</p> <p>4           A.    That's right.</p> <p>5           Q.    It's also the office where</p> <p>6   Chargeurs Boissy is located?</p> <p>7           A.    That's right.</p> <p>8           Q.    Any other companies based out of</p> <p>9   that lean head office?</p> <p>10          A.    Yes.</p> <p>11          Q.    What other ones?</p> <p>12          A.    Chargeurs Wool Eurasia.</p> <p>13          Q.    Any others?</p> <p>14          A.    Yes.</p> <p>15          Q.    Can you give me all of them,</p> <p>16   please?</p> <p>17          A.    Chargeurs Cloud, Chargeurs</p> <p>18   Technical Substrates, Chargetex 34,</p> <p>19   Chargetex 35 -- Chargetex is spelled</p> <p>20   C-H-A-R-G-E-T-E-X -- Chargeurs Textile,</p> <p>21   Chargeurs Boissy.</p> <p>22          Q.    When you say Chargeurs Cloud,</p> <p>23   can you spell that, please?</p> <p>24          A.    C-L-O-U-D.</p> <p>25          Q.    What does Chargeurs Cloud do?</p>	<p>1                   Defait</p> <p>2           title?</p> <p>3           THE INTERPRETER: The shares,</p> <p>4           the share capital of Senfa, S-E-N-F-A.</p> <p>5           A.    And also on behalf of Senfa and</p> <p>6           also another company, a new company called</p> <p>7           Leah.</p> <p>8           THE INTERPRETER: L-E-A-H.</p> <p>9           Q.    What does Senfa do?</p> <p>10          A.    It's a company that works with</p> <p>11          technical textiles. It makes them functional.</p> <p>12          Q.    Does it make any interlining?</p> <p>13          A.    No.</p> <p>14          Q.    What does Leah do?</p> <p>15          A.    Leah?</p> <p>16          Q.    L-E-A-H.</p> <p>17          A.    Oh, it's L-E-A-C-H, Leach.</p> <p>18          Q.    What does Leach do?</p> <p>19          A.    Light boxes.</p> <p>20          Q.    You said earlier that Chargeurs</p> <p>21   Fashion Technologies was the mother company</p> <p>22   for Chargeurs Technology Substrates? Do I</p> <p>23   have that right?</p> <p>24          A.    No. That's not correct.</p> <p>25   Chargeurs Fashion Technologies is not a</p>
Page 59	Page 61
<p>1                   Defait</p> <p>2           A.    So the commercial purpose of</p> <p>3   Chargeurs Cloud is everything related to</p> <p>4   aviation, the purchase of planes and the</p> <p>5   operation of planes.</p> <p>6           Q.    Chargetex 34 and 35, what do</p> <p>7   those companies do?</p> <p>8           A.    These are companies that no</p> <p>9   longer have any activity.</p> <p>10          Q.    What did they do when they had</p> <p>11   activity?</p> <p>12          A.    They were just holding companies,</p> <p>13   pure holding companies.</p> <p>14          Q.    For what companies?</p> <p>15          A.    They didn't have any shares.</p> <p>16   They were shells that were there for the use</p> <p>17   of the group whenever the need was felt.</p> <p>18          Q.    Chargeurs Technical Substrates,</p> <p>19   what does that company do?</p> <p>20          A.    So it's a company that was</p> <p>21   created recently, it's -- to put it simply,</p> <p>22   its purpose -- Chargeurs Fashion Technologies</p> <p>23   is the mother company for Chargeurs Technical</p> <p>24   Substrates and it holds the shares of Senfa.</p> <p>25   MS. MORGAN: Did you mean the</p>	<p>1                   Defait</p> <p>2           company, it's not a legal entity.</p> <p>3           Q.    So did you misspeak when you</p> <p>4           said Chargeurs Fashion Technologies earlier?</p> <p>5           A.    In what context did I speak</p> <p>6           about Chargeurs Fashion Technologies? What</p> <p>7           did I say?</p> <p>8           Q.    I believe you referred to it as</p> <p>9           a mother company of Chargeurs Technical</p> <p>10          Substrates. So that's incorrect?</p> <p>11          A.    No. That's not what I said.</p> <p>12          That's not at all what it is.</p> <p>13          Q.    What did you say then?</p> <p>14          A.    To answer what question?</p> <p>15          Q.    I asked you what Chargeurs</p> <p>16          Technical Substrates does, and you said to</p> <p>17          put it simply, Chargeurs Technical Substrates</p> <p>18          is the mother company of Chargeurs Fashion</p> <p>19          Technologies.</p> <p>20          A.    No.</p> <p>21          Q.    So what does Chargeurs Technical</p> <p>22          Substrates do?</p> <p>23          MR. STASSEN: Could we go off</p> <p>24          the record for a minute?</p> <p>25          (Whereupon, a discussion was</p>

Page 62	Page 64
<p>1 Defait</p> <p>2 held off the record.)</p> <p>3 A. So Chargeurs Technical Substrates</p> <p>4 is the business name of the division, but</p> <p>5 also recently there was a company created</p> <p>6 going by the name of Chargeurs Technical</p> <p>7 Substrates S.A.S.</p> <p>8 Q. Let's turn to page 80 of the</p> <p>9 document, please. At the top of the page it</p> <p>10 says Governance Structure and Board Committees.</p> <p>11 Do you see that?</p> <p>12 A. Yes.</p> <p>13 Q. This is in the section of the</p> <p>14 document that you created; correct?</p> <p>15 A. That's right.</p> <p>16 Q. When it says board committees,</p> <p>17 it's referring to the board of directors of</p> <p>18 Chargeurs S.A.; correct?</p> <p>19 A. No.</p> <p>20 Q. What board is it referring to?</p> <p>21 A. They are specialized committees</p> <p>22 that are subsections of the board of directors.</p> <p>23 Q. Subsections of the board of</p> <p>24 directors of Chargeurs S.A.; correct?</p> <p>25 A. That's right.</p>	<p>1 Defait</p> <p>2 beginning with the word similarly.</p> <p>3 If you can turn to that, please.</p> <p>4 A. Yes, I see.</p> <p>5 Q. I'm just going to read that into</p> <p>6 the record. Similarly, quote, discussions</p> <p>7 with the managing directors of the group's</p> <p>8 four business lines, both during the board</p> <p>9 meetings where they are invited to present</p> <p>10 their activity, during the strategic</p> <p>11 seminars organized by the group and during</p> <p>12 visits to Chargeurs' production sites, were</p> <p>13 deemed to be very positive.</p> <p>14 Do you see that, Ms. Defait?</p> <p>15 A. Yes.</p> <p>16 Q. Is it true that in 2017, the</p> <p>17 board of directors of Chargeurs, S.A. met</p> <p>18 with the managing director of Chargeurs</p> <p>19 Fashion Technologies?</p> <p>20 MS. MORGAN: Objection to form.</p> <p>21 You can answer.</p> <p>22 A. No.</p> <p>23 Q. It says managing directors of</p> <p>24 the group's four business lines.</p> <p>25 Is Chargeurs Fashion Technologies</p>
Page 63	Page 65
<p>1 Defait</p> <p>2 Q. How many members are currently</p> <p>3 on the board of Chargeurs, S.A.?</p> <p>4 A. Just a moment.</p> <p>5 Five.</p> <p>6 Q. Name them, please.</p> <p>7 A. Michael Fribourg, Columbus</p> <p>8 Holding.</p> <p>9 Q. Columbus?</p> <p>10 A. Yes. Columbus, C-O-L-O-M-B-U-S.</p> <p>11 Q. Is there one person that</p> <p>12 represents Columbus Holding?</p> <p>13 A. Yes.</p> <p>14 Q. Who?</p> <p>15 A. Nicolas Urbain.</p> <p>16 Q. The other three members?</p> <p>17 A. Isabelle Guichot, Cecelia</p> <p>18 Ragueneau, Emmanuel Coquoin.</p> <p>19 Q. Turn to page 83, please. On the</p> <p>20 right-hand column, it says Assessment of the</p> <p>21 Board of Directors.</p> <p>22 Do you see that?</p> <p>23 A. That's right.</p> <p>24 Q. Later on in this same section,</p> <p>25 there's a paragraph at the top of page 84</p>	<p>1 Defait</p> <p>2 one of those four business lines?</p> <p>3 A. So what is the question?</p> <p>4 Q. Does that mean -- strike that.</p> <p>5 Does that include the managing</p> <p>6 director of Chargeurs Fashion Technologies?</p> <p>7 A. Yes. It includes the managing</p> <p>8 director of Chargeurs Fashion Technologies.</p> <p>9 Q. Right.</p> <p>10 So in 2017, that was Bernard</p> <p>11 Vossart; correct?</p> <p>12 A. That's right.</p> <p>13 Q. So were there in fact discussions</p> <p>14 between the board of directors of Chargeurs,</p> <p>15 S.A. and Mr. Vossart in 2017?</p> <p>16 A. It's a very general question.</p> <p>17 Are you referring to something specifically?</p> <p>18 Q. I'm referring to what it says</p> <p>19 here, when it says discussions with the</p> <p>20 managing directors. I just want to know if</p> <p>21 that's true, whether there were discussions</p> <p>22 between the board of Chargeurs and Mr. Vossart</p> <p>23 as it says here.</p> <p>24 A. Yes. It is as it is written</p> <p>25 here, Bernard Vossart had a discussion with</p>

<p style="text-align: right;">Page 66</p> <p>1                   Defait</p> <p>2   the board of directors concerning the</p> <p>3   activities of the division of fashion --</p> <p>4   Chargeurs Fashion Technologies -- sorry --</p> <p>5   to present the activities of the division.</p> <p>6       Q.   Was that during one or more</p> <p>7   board meetings of board of directors of</p> <p>8   Chargeurs, S.A.?</p> <p>9       A.   It was during one meeting of the</p> <p>10   board of directors.</p> <p>11       Q.   You were at that meeting as</p> <p>12   well; correct?</p> <p>13       A.   That's right.</p> <p>14       Q.   And what was discussed during</p> <p>15   Mr. Vossart's presentation to the board?</p> <p>16       A.   Sorry. I'd like to make a</p> <p>17   rectification. I participated in all of the</p> <p>18   meetings of the board of directors except</p> <p>19   this one exceptionally because my son was</p> <p>20   sick.</p> <p>21       MS. MORGAN: I'd like to take a</p> <p>22   very short break.</p> <p>23       MR. D'ANGELO: We took a break</p> <p>24   like 20 minutes ago.</p> <p>25       MS. MORGAN: I know. I'm saying</p>	<p style="text-align: right;">Page 68</p> <p>1                   Defait</p> <p>2       A.   So the board of directors does</p> <p>3   not -- did not only meet in order to have a</p> <p>4   discussion with Bernard Vossart, but also to</p> <p>5   meet with managing directors for the</p> <p>6   different lines of production who on the</p> <p>7   occasion presented their budgets for the</p> <p>8   past year, and it's also a way for the board</p> <p>9   of directors to be informed about all the</p> <p>10   various activities taking place within the</p> <p>11   various divisions.</p> <p>12       Q.   Why does the board of directors</p> <p>13   need to be informed about the various</p> <p>14   activities taking place within Chargeurs</p> <p>15   Fashion Technologies?</p> <p>16       A.   The board of directors needs to</p> <p>17   be informed about the activities of the</p> <p>18   various subsidiaries just as the president</p> <p>19   of the group needs to be informed of that,</p> <p>20   and it's one way for the board of directors</p> <p>21   to learn about various activities taking</p> <p>22   place in the group, and it's important for</p> <p>23   them to have -- to become -- to have that</p> <p>24   information about the activities of the</p> <p>25   subsidiaries and what has happened in the</p>
<p style="text-align: right;">Page 67</p> <p>1                   Defait</p> <p>2   very short.</p> <p>3       MR. D'ANGELO: All right.</p> <p>4       (Whereupon, a brief recess was</p> <p>5   taken.)</p> <p>6   CONTINUED BY MR. D'ANGELO:</p> <p>7       Q.   I understand you didn't attend</p> <p>8   the meeting, but do you know what was</p> <p>9   discussed with Mr. Vossart regarding</p> <p>10   Chargeurs Fashion Technologies?</p> <p>11       A.   Yes, in part.</p> <p>12       Q.   What do you know that was</p> <p>13   discussed?</p> <p>14       A.   What was transcribed in the</p> <p>15   minutes of this meeting of the board in</p> <p>16   question.</p> <p>17       Q.   What general topics were covered?</p> <p>18       A.   So what was discussed were the</p> <p>19   outstanding data for the year, the</p> <p>20   acquisition plans in the pipeline, actions</p> <p>21   that were identified as part of the game</p> <p>22   changer plan and the budget forecast for 2018.</p> <p>23       Q.   Why would the board of directors</p> <p>24   of Chargeurs, S.A. need to meet with</p> <p>25   Mr. Vossart about these matters?</p>	<p style="text-align: right;">Page 69</p> <p>1                   Defait</p> <p>2   subsidiaries.</p> <p>3       Q.   Why is it important for them to</p> <p>4   have that information?</p> <p>5       A.   The board of directors takes a</p> <p>6   stance on the general direction of the group</p> <p>7   and in that context Chargeurs has an</p> <p>8   obligation toward its investors. It's</p> <p>9   important for both the president and the</p> <p>10   board of directors to know what activities</p> <p>11   are going on within a group, and Chargeurs,</p> <p>12   S.A. has an obligation toward its shareholders,</p> <p>13   a responsibility toward its shareholders.</p> <p>14       Q.   And does Chargeurs S.A.'s</p> <p>15   obligation toward its shareholders include</p> <p>16   making sure that Chargeurs Fashion Technologies</p> <p>17   is headed in the right direction?</p> <p>18       A.   Chargeurs, S.A. does not</p> <p>19   establish a direction for the various</p> <p>20   production lines, but it has to render</p> <p>21   accounts. The -- in other words, the</p> <p>22   financial results of Chargeurs, S.A. have to</p> <p>23   be disclosed and the consolidated accounts</p> <p>24   have to be reported.</p> <p>25       Q.   If the board of Chargeurs, S.A.</p>

Page 70	Page 72
<p>1                   Defait</p> <p>2   determined that Chargeurs Fashion Technologies</p> <p>3   was not headed in the right general direction</p> <p>4   to use your term, would it take steps to</p> <p>5   change that?</p> <p>6           MS. MORGAN: Objection to the</p> <p>7           form. You can answer to the extent it</p> <p>8           calls for a hypothetical.</p> <p>9           A.   It is indeed a hypothetical</p> <p>10   situation which I've never encountered since</p> <p>11   I started working with Chargeurs Boissy.</p> <p>12           Q.   So can I call Chargeurs Fashion</p> <p>13   Technologies CFT?</p> <p>14           A.   Yes.</p> <p>15           Q.   So if the board of Chargeurs, S.A.</p> <p>16   knew that the board of CFT was losing money,</p> <p>17   it would just let it happen?</p> <p>18           MS. MORGAN: Objection to the</p> <p>19           form. You can answer.</p> <p>20           A.   So Chargeurs Fashion Technologies,</p> <p>21   the division of Chargeurs Fashion Technologies,</p> <p>22   is under the responsibility of the managing</p> <p>23   director of that division. Now, if that</p> <p>24   managing director doesn't achieve the expected</p> <p>25   results, then certain measures can be taken</p>	<p>1                   Defait</p> <p>2           Q.   So that's my question, the board</p> <p>3   of Chargeurs, S.A. has the ability to</p> <p>4   dismiss the managing director of Chargeurs</p> <p>5   Fashion Technologies; correct?</p> <p>6           A.   No; because the general manager</p> <p>7   of CFT is not under the purview of Chargeurs,</p> <p>8   S.A., and it is not the role of the board of</p> <p>9   directors of Chargeurs, S.A., it's neither</p> <p>10   its responsibility nor within its power to</p> <p>11   terminate the general manager.</p> <p>12           Q.   I'm not referring to general</p> <p>13   manager. I'm referring to the managing</p> <p>14   director of CFT.</p> <p>15           Does the board of Chargeurs,</p> <p>16   S.A. have the ability to dismiss the</p> <p>17   managing director of CFT?</p> <p>18           A.   No.</p> <p>19           Q.   If the board of directors wanted</p> <p>20   to dismiss the managing director of CFT,</p> <p>21   could they do anything about that?</p> <p>22           MS. MORGAN: Objection to the</p> <p>23   form. Are you talking about the board</p> <p>24   of directors of Chargeurs, S.A.?</p> <p>25           MR. D'ANGELO: Yes. That's what</p>
Page 71	Page 73
<p>1                   Defait</p> <p>2   following certain procedures, certain roles.</p> <p>3   If Chargeurs Entoilage and the -- for</p> <p>4   Chargeurs Entoilage, which has -- for the</p> <p>5   CEO of Chargeurs Entoilage, these rules</p> <p>6   would apply if Chargeurs Entoilage didn't</p> <p>7   achieve the expected results, and certain</p> <p>8   sanctions could be taken following rules</p> <p>9   governing appointment or rules following</p> <p>10   leading to dismissal.</p> <p>11           Q.   So if the board of Chargeurs,</p> <p>12   S.A. determined that the managing director</p> <p>13   of CFT wasn't doing a good job, they could</p> <p>14   dismiss him?</p> <p>15           A.   No, I didn't say that, and, in</p> <p>16   fact, it is not the -- it is not what is</p> <p>17   done in fact.</p> <p>18           Q.   Well, you said certain sanctions</p> <p>19   could be taken. What did you mean by</p> <p>20   sanctions?</p> <p>21           A.   I'm talking about dismissal,</p> <p>22   firing.</p> <p>23           Q.   Of whom?</p> <p>24           A.   The general manager of Chargeurs</p> <p>25   Fashion Technologies.</p>	<p>1                   Defait</p> <p>2   we've been talking about the whole time.</p> <p>3           MS. MORGAN: And also objection</p> <p>4   to the extent it calls for speculation.</p> <p>5   You can answer if you understand.</p> <p>6           A.   Indeed this case has never</p> <p>7   presented itself in practice, and, again, it</p> <p>8   is not up to the board of directors of</p> <p>9   Chargeurs, S.A. to take any legal action to</p> <p>10   dismiss the general manager of CFT. It is</p> <p>11   not part of its assigned tasks.</p> <p>12           Q.   So who has the ability to</p> <p>13   dismiss the managing director of CFT?</p> <p>14           A.   The managing director of CFT</p> <p>15   represents a -- it represents a description</p> <p>16   of a function, it's not a legal title as</p> <p>17   such. The manning director of CFT, for him</p> <p>18   it would be up to the president of Chargeurs</p> <p>19   Entoilage who would have the mandate over</p> <p>20   the general manager of the division.</p> <p>21           Q.   Who is the president of Chargeurs</p> <p>22   Entoilage now?</p> <p>23           A.   Angela Chan.</p> <p>24           Q.   Isn't she also the managing</p> <p>25   director of CFT?</p>



<p style="text-align: right;">Page 74</p> <p>1                   Defait</p> <p>2           A.    She is responsible for that</p> <p>3   division.</p> <p>4           Q.    So she'd have to fire herself?</p> <p>5           A.    No. That's not what I said.</p> <p>6           Q.    So if someone wanted to remove</p> <p>7   Angela Chan, who would it be?</p> <p>8           A.    As per the bylaws of Chargeurs</p> <p>9   Entoilage, those who are in power to mandate</p> <p>10 would be the supervisory board.</p> <p>11          Q.    Supervisory board of what?</p> <p>12          A.    The supervisory board of</p> <p>13   Chargeurs Entoilage.</p> <p>14          Q.    Who is that composed of?</p> <p>15          A.    Chargeurs, S.A. and Chargeurs</p> <p>16   Boissy.</p> <p>17          Q.    So we got there eventually.</p> <p>18                Getting back to page 84.</p> <p>19          MR. STASSEN: That's not a</p> <p>20   question.</p> <p>21          Q.    No. There's no question pending.</p> <p>22                First paragraph in the page, the</p> <p>23   same paragraph we looked at earlier, it</p> <p>24   refers to strategic seminars organized by</p> <p>25   the group.</p>	<p style="text-align: right;">Page 76</p> <p>1                   Defait</p> <p>2           A.    What do you mean by strategic</p> <p>3   direction?</p> <p>4           Q.    Well, you said speakers were</p> <p>5   brought in and there were discussion groups;</p> <p>6   correct?</p> <p>7           A.    Yes.</p> <p>8           Q.    And what general subjects did</p> <p>9   the speakers present on?</p> <p>10          A.    In particular, there was a</p> <p>11   presentation about the code of ethics and</p> <p>12   the new French rules governing ethics and</p> <p>13   anti-corruption among other subjects.</p> <p>14          Q.    What were the discussion groups</p> <p>15   held on?</p> <p>16          A.    Talent management, innovation,</p> <p>17   sales and production.</p> <p>18          Q.    When you say production, you</p> <p>19   mean production of products?</p> <p>20          A.    Yes.</p> <p>21          Q.    Was one of the products being</p> <p>22   discussed interlining?</p> <p>23          A.    It's more about the production</p> <p>24   process than about the finished -- than</p> <p>25   about the product that is produced.</p>
<p style="text-align: right;">Page 75</p> <p>1                   Defait</p> <p>2           Do you see that?</p> <p>3           A.    Yes.</p> <p>4           Q.    What's that a reference to?</p> <p>5           A.    It was a seminar held in New</p> <p>6   York involving key people from the four</p> <p>7   divisions including the key people from</p> <p>8   Chargeurs, S.A. and some people as well from</p> <p>9   Chargeurs Boissy.</p> <p>10          Q.    Who organized that seminar?</p> <p>11          A.    Chargeurs, S.A.</p> <p>12          Q.    Did the managing director of CFT</p> <p>13   at the time attend?</p> <p>14          A.    Yes.</p> <p>15          Q.    Why?</p> <p>16          A.    Because he was one of the key</p> <p>17   people who were invited.</p> <p>18          Q.    What happened at that strategic</p> <p>19   seminar?</p> <p>20          A.    They're presentations made by</p> <p>21   external presenters and they're also working</p> <p>22   groups discussion groups.</p> <p>23          Q.    Is the strategic direction of</p> <p>24   the four main business lines discussed at</p> <p>25   that seminar?</p>	<p style="text-align: right;">Page 77</p> <p>1                   Defait</p> <p>2           Q.    Does that include the production</p> <p>3   process of interlining?</p> <p>4           A.    The key people from -- the key</p> <p>5   interlining people were present, so yes,</p> <p>6   they must have spoken about that subject.</p> <p>7           Q.    When you say the key interlining</p> <p>8   people were present, who does that include?</p> <p>9           A.    The -- yes, the general manager</p> <p>10   of the division, the head of finance for the</p> <p>11   general manager and the heads of various</p> <p>12   subsidiaries and some salespeople.</p> <p>13          Q.    And the head of the division at</p> <p>14   the time was Bernard Vossart?</p> <p>15          A.    That's right.</p> <p>16          Q.    Head of finance, was that</p> <p>17   Mr. Rousseau?</p> <p>18          A.    That's right.</p> <p>19          Q.    And you said the heads of</p> <p>20   various subsidiaries. Which subsidiaries?</p> <p>21          MR. D'ANGELO: Can you translate</p> <p>22   that portion of the answer so far?</p> <p>23          A.    There is a Chuck Lai, Peter Seah</p> <p>24   and Alexandre Marlien.</p> <p>25          THE INTERPRETER: Alexandre,</p>



Page 78	Page 80
<p>1 Defait</p> <p>2 with the RE inverted at the end,</p> <p>3 Marlien.</p> <p>4 Q. Did anyone from Chargeurs, S.A.</p> <p>5 participate in the discussion group regarding</p> <p>6 production processes for interlining?</p> <p>7 A. I don't know. I wasn't involved</p> <p>8 in that discussion.</p> <p>9 Q. Getting back to page 84, that</p> <p>10 same paragraph, I'm just going to reread it</p> <p>11 so we're on the same page here. It says</p> <p>12 similarly, quote, discussions with the</p> <p>13 managing directors of the group's four</p> <p>14 business lines, both during the board</p> <p>15 meetings where they are invited to present</p> <p>16 their activity, during the strategic</p> <p>17 seminars organized by the group and during</p> <p>18 visits to Chargeurs' production sites were</p> <p>19 deemed to be very positive.</p> <p>20 My question is: Did anyone from</p> <p>21 Chargeurs, S.A. or its board of directors</p> <p>22 visit any production sites where interlining</p> <p>23 is made in 2017?</p> <p>24 MS. MORGAN: Objection to the</p> <p>25 form, compound, but you can answer.</p>	<p>1 Defait</p> <p>2 A. I see.</p> <p>3 Q. And then it lists several</p> <p>4 companies under that; correct?</p> <p>5 A. That's right.</p> <p>6 Q. And where it says Fashion</p> <p>7 Technologies segment, that's a reference to</p> <p>8 CFT; correct?</p> <p>9 A. That's right.</p> <p>10 Q. And are all the companies listed</p> <p>11 under the Heading A, Main Fully Consolidated</p> <p>12 Companies, are those all fully consolidated</p> <p>13 companies?</p> <p>14 A. What do you mean by fully</p> <p>15 consolidated? I have to look at the context</p> <p>16 in which this is set.</p> <p>17 Q. Yes. Sure. Let me start by</p> <p>18 asking you what fully consolidated means.</p> <p>19 MS. MORGAN: As it's used in</p> <p>20 this document --</p> <p>21 MR. D'ANGELO: Yes.</p> <p>22 MS. MORGAN: -- or in general?</p> <p>23 MR. D'ANGELO: Yes.</p> <p>24 A. So we're in the financial and</p> <p>25 accounting information section --</p>
Page 79	Page 81
<p>1 Defait</p> <p>2 A. In particular regarding</p> <p>3 interlining production sites, I don't know.</p> <p>4 Q. Well, you wrote this paragraph;</p> <p>5 am I right?</p> <p>6 A. Yes.</p> <p>7 Q. What production sites did you</p> <p>8 have in mind?</p> <p>9 A. Boston tapes.</p> <p>10 Q. What's made at Boston tapes?</p> <p>11 A. Temporary surface protection film.</p> <p>12 Q. Turn to page 146, please.</p> <p>13 Do you see on the top of the</p> <p>14 page it lists main consolidated companies?</p> <p>15 A. Yes.</p> <p>16 Q. And then it says at December 31,</p> <p>17 2017, 58 companies were fully consolidated?</p> <p>18 A. Yes, I see.</p> <p>19 Q. And then under that it says</p> <p>20 parent company Chargeurs, S.A.</p> <p>21 Do you see that?</p> <p>22 A. I see.</p> <p>23 Q. And then under that it says main</p> <p>24 fully consolidated companies.</p> <p>25 Do you see that?</p>	<p>1 Defait</p> <p>2 Q. Right.</p> <p>3 A. -- so it's solely a financial</p> <p>4 concept.</p> <p>5 Q. So what does it mean when</p> <p>6 companies are fully consolidated from a</p> <p>7 financial standpoint?</p> <p>8 A. So I'm not an expert in finance,</p> <p>9 but it's the consolidated account of the</p> <p>10 subsidiaries that are referred to at the</p> <p>11 group level, so for Chargeurs, S.A. there</p> <p>12 are both corporate accounts and consolidated</p> <p>13 accounts and the consolidated accounts</p> <p>14 include the subsidiaries, the accounts of</p> <p>15 the subsidiaries.</p> <p>16 Q. So the subsidiaries under CFT</p> <p>17 that are listed here, are there financial</p> <p>18 results consolidated with one another?</p> <p>19 A. So there are subsidiaries whose</p> <p>20 accounts are consolidated, but I'm not</p> <p>21 enough of an expert to tell you what it</p> <p>22 means from the financial point of view.</p> <p>23 Q. Is it fair to say since all</p> <p>24 these companies listed under Section A are</p> <p>25 listed below the heading Main Fully</p>

<p style="text-align: right;">Page 82</p> <p>1                   Defait</p> <p>2 Consolidated Companies, that they are all</p> <p>3 fully consolidated at least as that term is</p> <p>4 used in this document?</p> <p>5       A.   From a financial point of view,</p> <p>6 the answer is yes, but it would also mean</p> <p>7 that -- it would also have to be explained</p> <p>8 in terms of what fully consolidated means,</p> <p>9 and since I'm not a financial manager, I</p> <p>10 can't explain any further what consolidated</p> <p>11 accounts would mean in terms of the impact</p> <p>12 or how these consolidated accounts are</p> <p>13 actually prepared.</p> <p>14       Q.   Okay. Let's turn to page 108,</p> <p>15 please.</p> <p>16       Do you see on the right-most</p> <p>17 column it says consolidation methods?</p> <p>18       A.   Yes.</p> <p>19       Q.   And it says subsidiaries under</p> <p>20 that? Do you see that?</p> <p>21       A.   Yes.</p> <p>22       Q.   The third paragraph under that</p> <p>23 section starting with subsidiaries, do you</p> <p>24 see that paragraph?</p> <p>25       A.   Yes.</p>	<p style="text-align: right;">Page 84</p> <p>1                   Defait</p> <p>2 for financial purposes?</p> <p>3       A.   Deconsolidated no, I don't have</p> <p>4 that information. I can't say whether it</p> <p>5 has indeed been the case.</p> <p>6       Q.   Do you have any reason to</p> <p>7 believe that any of the companies listed</p> <p>8 under the CFT segment have in fact been</p> <p>9 deconsolidated?</p> <p>10       A.   There's no way for me to answer</p> <p>11 that. I don't have sufficient information</p> <p>12 to ascertain whether it is or it is not the</p> <p>13 case and I can't get.</p> <p>14       Q.   You said earlier, Ms. Defait,</p> <p>15 that -- by the way, is it okay if I call you</p> <p>16 Miss Defait, Ms., Mrs.? Which would you</p> <p>17 prefer?</p> <p>18       A.   Legally Miss is no longer used</p> <p>19 in France.</p> <p>20       Q.   I'll say Ms. I think it was my</p> <p>21 pronunciation.</p> <p>22       A.   So you can say whichever way.</p> <p>23       Q.   I think you said earlier --</p> <p>24       A.   For me it's not an issue.</p> <p>25       Q.   I mean no disrespect by it. I</p>
<p style="text-align: right;">Page 83</p> <p>1                   Defait</p> <p>2       Q.   It says: Subsidiaries are fully</p> <p>3 consolidated from the date on which control</p> <p>4 is transferred to the group.</p> <p>5       Do you see that?</p> <p>6       A.   I see it.</p> <p>7       Q.   Is that statement true, to the</p> <p>8 best of your knowledge?</p> <p>9       A.   Everything that is in the</p> <p>10 reference document is -- and the reference</p> <p>11 document is a document that is -- that is</p> <p>12 disclosed to the market, everything is</p> <p>13 considered to be true, everything should be</p> <p>14 true and the document must be true. Now,</p> <p>15 when you look -- you have to look at the</p> <p>16 context of the sentences here to see what is</p> <p>17 meant by fully consolidated and even by the</p> <p>18 word control.</p> <p>19       Q.   The companies that we looked at</p> <p>20 earlier that were listed on page 146, do you</p> <p>21 remember that, all the companies that were</p> <p>22 listed under the heading Main Fully</p> <p>23 Consolidated Companies, do you know if any</p> <p>24 of the companies listed within the Fashion</p> <p>25 Technologies segment have been deconsolidated</p>	<p style="text-align: right;">Page 85</p> <p>1                   Defait</p> <p>2 hope you understand.</p> <p>3       You stated earlier that CFT is</p> <p>4 not a legal entity; is that right?</p> <p>5       A.   When you use the term CFT, is it</p> <p>6 CFT to mean CFT or to designate something</p> <p>7 else? Is there another context I should</p> <p>8 understand?</p> <p>9       Q.   No. So whenever I say CFT, you</p> <p>10 should understand I'm referring to Chargeurs</p> <p>11 Fashion Technologies.</p> <p>12       A.   Okay. Yes, it's true, it's not</p> <p>13 a legal entity.</p> <p>14       Q.   What's the highest legal entity</p> <p>15 within the Chargeurs group that's responsible</p> <p>16 for CFT?</p> <p>17       A.   It's a very broad question, but</p> <p>18 if you're making reference to the parent</p> <p>19 company, the division, that would be</p> <p>20 Chargeurs Entoilage.</p> <p>21       Q.   And Chargeurs Entoilage is owned</p> <p>22 a hundred percent by Chargeurs, S.A.; correct?</p> <p>23       A.   Chargeurs, S.A. owns a hundred</p> <p>24 percent of the shares of Chargeurs Entoilage.</p> <p>25       Q.   You are familiar with the</p>

<p style="text-align: right;">Page 86</p> <p>1                   Defait</p> <p>2   company known as Fitexin S.A.S.; right?</p> <p>3       A.   Yes.</p> <p>4       Q.   And Fitexin is owned a hundred</p> <p>5   percent by Chargeurs Entoilage; correct?</p> <p>6       A.   Yes.</p> <p>7       Q.   Fitexin is also within the CFT</p> <p>8   division; correct?</p> <p>9       A.   Yes.</p> <p>10      Q.   What is the division of labor,</p> <p>11   if any, between Chargeurs Entoilage and</p> <p>12   Fitexin with respect to the CFT division?</p> <p>13      MS. MORGAN: Eric, I don't think</p> <p>14   you translated if any.</p> <p>15      THE INTERPRETER: I don't</p> <p>16   remember what I said. I can repeat my</p> <p>17   translation.</p> <p>18      MR. D'ANGELO: Sure.</p> <p>19      A.   What do you mean by labor?</p> <p>20      Q.   What does Chargeurs Entoilage do</p> <p>21   with respect to CFT?</p> <p>22      A.   I don't know. All that I know</p> <p>23   is that Chargeurs Entoilage is the parent</p> <p>24   company of Fitexin.</p> <p>25      Q.   You don't know what Chargeurs</p>	<p style="text-align: right;">Page 88</p> <p>1                   Defait</p> <p>2                (Whereupon, the requested</p> <p>3   portion of the record was read back</p> <p>4   by the reporter.)</p> <p>5      MS. MORGAN: And the same</p> <p>6   objection holds. I apologize. I meant</p> <p>7   the same instruction holds not to</p> <p>8   answer the question to the extent that</p> <p>9   it calls for any discussions with</p> <p>10   counsel.</p> <p>11     Q.   Can you answer the question</p> <p>12   subject to that instruction, Ms. Defait?</p> <p>13     A.   Yes, I can answer, and the</p> <p>14   answer is no.</p> <p>15     Q.   Angela Chan, she's the managing</p> <p>16   director at CFT I think you said earlier;</p> <p>17   correct?</p> <p>18     A.   Yes.</p> <p>19     Q.   And she's an employee of</p> <p>20   Chargeurs Entoilage; is that right?</p> <p>21     A.   Yes.</p> <p>22     Q.   Does she have someone that she</p> <p>23   reports to within the Chargeurs group?</p> <p>24     A.   When you refer to the Chargeurs</p> <p>25   group, which company specifically are you</p>
<p style="text-align: right;">Page 87</p> <p>1                   Defait</p> <p>2   Entoilage does?</p> <p>3       A.   Not in practical terms, no.</p> <p>4       Q.   Why not?</p> <p>5       A.   I am not an employee of</p> <p>6   Chargeurs Entoilage or Fitexin, I am an</p> <p>7   employee of Chargeurs Boissy, so I don't</p> <p>8   have any knowledge if the day-to-day work</p> <p>9   that goes on whether at Chargeurs Entoilage</p> <p>10   or Fitexin or in relation to each other, all</p> <p>11   I know is that it is a parent company and</p> <p>12   that's all I know.</p> <p>13      Q.   So the subject of what Chargeurs</p> <p>14   Entoilage or Fitexin do, that didn't come up</p> <p>15   in your deposition prep?</p> <p>16      MS. MORGAN: And I'll instruct</p> <p>17   you not to answer with regard to any</p> <p>18   conversations you had with counsel.</p> <p>19      MR. D'ANGELO: It's a yes or no.</p> <p>20   You are instructing her not to answer</p> <p>21   yes or no?</p> <p>22      MS. MORGAN: I need to hear your</p> <p>23   question.</p> <p>24      MR. D'ANGELO: Can you reread</p> <p>25   it, please, Robin?</p>	<p style="text-align: right;">Page 89</p> <p>1                   Defait</p> <p>2   referring to?</p> <p>3       Q.   Any of them.</p> <p>4       A.   Angela Chan reports to Michael</p> <p>5   Fribourg.</p> <p>6       Q.   He's the CEO of Chargeurs, S.A.;</p> <p>7   correct?</p> <p>8       A.   Yes.</p> <p>9       Q.   What does she report to him</p> <p>10   regarding?</p> <p>11      A.   So when I say report, I mean</p> <p>12   that in the hierarchy, she reports to</p> <p>13   Michael Fribourg.</p> <p>14      Q.   She doesn't give him any reports</p> <p>15   regarding the CFT business on any kind of</p> <p>16   periodic basis?</p> <p>17      A.   When you say CFT business, do</p> <p>18   you mean CFT business in general or what</p> <p>19   sense? What kind of information or activity</p> <p>20   is encompassed by your question?</p> <p>21      Q.   Just the business in a general</p> <p>22   sense, any aspect of the CFT business. Does</p> <p>23   she give him any periodic reports at all,</p> <p>24   does it happen in the context of a Board</p> <p>25   meeting or some other meeting?</p>

<p style="text-align: right;">Page 90</p> <p>1 Defait</p> <p>2 MS. MORGAN: Objection to the</p> <p>3 form, compound, but you can answer.</p> <p>4 A. There is a monthly meeting where</p> <p>5 Angela Chan and Michael Fribourg in particular</p> <p>6 meet. There are also other people who are</p> <p>7 present. Angela Chan reports on the financial</p> <p>8 state of the division. I also know that she</p> <p>9 reports to the executive committee, but I</p> <p>10 can't give you more information about that,</p> <p>11 I don't really know that much information</p> <p>12 about its particulars because I don't</p> <p>13 participate in the executive committee</p> <p>14 meetings.</p> <p>15 Q. The monthly meetings that</p> <p>16 Ms. Chan has with Mr. Fribourg, is anyone</p> <p>17 else from Chargeurs, S.A. present at those</p> <p>18 meetings?</p> <p>19 A. So at the monthly meetings,</p> <p>20 there is Joelle Fabre-Hoffmeister, there's</p> <p>21 also Sampierro Lanfranchi and Audree Petit,</p> <p>22 and also Mathieu Baliscut.</p> <p>23 Q. Who are those other three</p> <p>24 individuals' position that you just</p> <p>25 mentioned?</p>	<p style="text-align: right;">Page 92</p> <p>1 Defait</p> <p>2 (Time resumed: 2:17 p.m.)</p> <p>3 CONTINUED BY MR. D'ANGELO:</p> <p>4 Q. Welcome back, Ms. Defait.</p> <p>5 You understand you're still</p> <p>6 under oath; correct?</p> <p>7 A. Yes.</p> <p>8 Q. Before we broke for lunch, I was</p> <p>9 asking you some questions about the ways in</p> <p>10 which Angela Chan reports to individuals at</p> <p>11 Chargeurs, S.A.</p> <p>12 Do you remember our talking</p> <p>13 about that?</p> <p>14 A. Yes, I do.</p> <p>15 Q. And I believe you mentioned that</p> <p>16 in addition to monthly meetings with Mr.</p> <p>17 Fribourg and other individuals that Ms. Chan</p> <p>18 also reports to an executive committee of</p> <p>19 some kind.</p> <p>20 Do you remember saying that?</p> <p>21 THE INTERPRETER: The</p> <p>22 interpreter wants to check something.</p> <p>23 MR. D'ANGELO: Sure.</p> <p>24 A. So I don't know if it's a</p> <p>25 question of how the term is interpreted, to</p>
<p style="text-align: right;">Page 91</p> <p>1 Defait</p> <p>2 MS. MORGAN: Frank -- sorry.</p> <p>3 You can answer his question, but she</p> <p>4 needs to use the facilities.</p> <p>5 MR. D'ANGELO: Oh, sure. Sure.</p> <p>6 Just because there's a question</p> <p>7 pending, let's get an answer and</p> <p>8 then --</p> <p>9 A. So, as I had said before, Joelle</p> <p>10 Fabre-Hoffmeister is secretary general, then</p> <p>11 Audree Petit is head of strategy, also she's</p> <p>12 the head of the -- of business solutions,</p> <p>13 Mathieu Baliscut is head of business</p> <p>14 development and strategic partnerships, and</p> <p>15 Sampierro Lanfranchi is head of mergers and</p> <p>16 acquisitions and special advisor to the</p> <p>17 president -- the special advisor to the</p> <p>18 present.</p> <p>19 MS. MORGAN: You can use the</p> <p>20 rest room now.</p> <p>21 MR. D'ANGELO: Yes.</p> <p>22 (Whereupon, a discussion was</p> <p>23 held off the record.)</p> <p>24 (Time noted: 1:12 p.m.)</p> <p>25 (Lunch recess was taken.)</p>	<p style="text-align: right;">Page 93</p> <p>1 Defait</p> <p>2 report to, but she participates in the</p> <p>3 meetings of the executive committee.</p> <p>4 Q. Who else is on that executive</p> <p>5 committee?</p> <p>6 A. So this is Joelle Fabre-</p> <p>7 Hoffmeister, Joelle, Angela Chan, Federico</p> <p>8 Paullier, Laurent Derolez, Audree Petit,</p> <p>9 Sampierro Lanfranchi, Olivier Buquen --</p> <p>10 THE INTERPRETER: Sorry.</p> <p>11 A. -- Patrick Bolleford.</p> <p>12 MS. MORGAN: Frank, do you want</p> <p>13 her to spell them now?</p> <p>14 MR. D'ANGELO: Yes.</p> <p>15 Q. If you wouldn't mind spelling</p> <p>16 those names, please, Ms. Defait. We already</p> <p>17 have Mr. Fribourg, Ms. Fabre-Hoffmeister and</p> <p>18 Mr. Lanfranchi, but if you can spell the</p> <p>19 other names.</p> <p>20 A. That was Federico Paullier,</p> <p>21 P-A-U-L-L-I-E-R. Laurent, L-A-U-R-E-N-T,</p> <p>22 followed by D-E-R-O-L-E-Z. And then Patrick</p> <p>23 B-O-L-L-E-F-O-R-D. Olivier, O-L-I-V-I-E-R,</p> <p>24 Buquen, B-U-Q-U-E-N.</p> <p>25 Q. Are any of those individuals</p>

Page 94	Page 96
<p>1                   Defait</p> <p>2   employed by Chargeurs, S.A.?</p> <p>3     A.   No. Not all of them.</p> <p>4     Q.   Are some of them?</p> <p>5     A.   Yes.</p> <p>6     Q.   Which ones?</p> <p>7     A.   Joelle Fabre-Hoffmeister,</p> <p>8   Sampierro Lanfranchi, Audree Petit, and</p> <p>9   that's it.</p> <p>10    Q.   Are any of those individuals</p> <p>11   directors on the board of directors for</p> <p>12   Chargeurs, S.A.?</p> <p>13    A.   Yes.</p> <p>14    Q.   Which ones?</p> <p>15    A.   Michael Fribourg.</p> <p>16    Q.   Any others?</p> <p>17    A.   No.</p> <p>18    Q.   And what types of matters are</p> <p>19   discussed at this executive committee --</p> <p>20   excuse me -- at meetings of this executive</p> <p>21   committee?</p> <p>22    A.   I don't know.</p> <p>23    Q.   When you say it's an executive</p> <p>24   committee, is it a committee of some larger</p> <p>25   body?</p>	<p>1                   Defait</p> <p>2   S.A. and it also comprises the general</p> <p>3   managers of the respective divisions.</p> <p>4     Q.   Turn to page 86 of that document,</p> <p>5   please.</p> <p>6           Is that the executive committee</p> <p>7   you referred to earlier?</p> <p>8     A.   Yes.</p> <p>9     Q.   And above the words Executive</p> <p>10   Committee, it says Presentation of the</p> <p>11   Members of Management.</p> <p>12           Do you see that?</p> <p>13    A.   I see the title; yes.</p> <p>14    Q.   Management of what?</p> <p>15           THE INTERPRETER: Sorry. The</p> <p>16   interpreter needs to catch up.</p> <p>17    A.   So as used in this document, you</p> <p>18   can see here the members of the Board and</p> <p>19   you can note Michael Fribourg who is in the</p> <p>20   management of Chargeurs, S.A. because as you</p> <p>21   see indicated here he is the CEO of</p> <p>22   Chargeurs, S.A., and you also see the</p> <p>23   management of CFT represented by -- in the</p> <p>24   person of Angela Chan who is the managing</p> <p>25   director of CFT. It is also the case for</p>
Page 95	Page 97
<p>1                   Defait</p> <p>2     A.   I'm not sure I understand the</p> <p>3   question. What larger body?</p> <p>4     Q.   Is it a -- you refer to it as a</p> <p>5   committee. Is it a committee of the</p> <p>6   Chargeurs group, is it a committee of some</p> <p>7   other organization or body?</p> <p>8     A.   The Chargeurs group is not an</p> <p>9   entity. It's a designation. What do you</p> <p>10   mean by the Chargeurs group in this context?</p> <p>11    Q.   How are the members of this</p> <p>12   committee selected?</p> <p>13    A.   I don't know.</p> <p>14    Q.   When they meet, where do they</p> <p>15   meet?</p> <p>16    A.   In Paris, although I don't know</p> <p>17   if it's the only place.</p> <p>18    Q.   Do these individuals comprise</p> <p>19   the management of Chargeurs, S.A.?</p> <p>20    A.   No.</p> <p>21    Q.   Do they comprise the management</p> <p>22   of the Chargeurs group companies?</p> <p>23    A.   So the term management is a</p> <p>24   rather diffuse one. In this executive</p> <p>25   committee, there is the CEO of Chargeurs,</p>	<p>1                   Defait</p> <p>2   Laurent Derolez present here as the chief</p> <p>3   executive officer of Chargeurs Protective</p> <p>4   Films, and then followed by Patrick Bolleford</p> <p>5   who is the managing director of Chargeurs</p> <p>6   Technical Substrates present here as part of</p> <p>7   the management of Chargeurs, S.A. So this</p> <p>8   title refers to the management of each legal</p> <p>9   entity in each respective sector and company</p> <p>10   that they represent indicated -- as indicated</p> <p>11   here.</p> <p>12    Q.   So when you say management of</p> <p>13   each legal entity, which legal entities</p> <p>14   within Chargeurs Fashion Technologies are</p> <p>15   being managed?</p> <p>16    A.   So if you take the case of</p> <p>17   Angela Chan, she -- her role, her</p> <p>18   responsibility is as the general manager of</p> <p>19   her respective division, but within that</p> <p>20   division she is also present of Chargeurs</p> <p>21   Entoilage and she is president of Chargeurs</p> <p>22   Entoilage and part of the management of</p> <p>23   Chargeurs Entoilage, she is also president</p> <p>24   of Fitexin and part of the management of</p> <p>25   Fitexin, so for each legal entity you have</p>

25 (Pages 94 to 97)



Page 98	Page 100
<p>1                   Defait</p> <p>2   directors, you have managers, so the term</p> <p>3   management encompasses a very broad</p> <p>4   definition of things and so you have to</p> <p>5   place it in its proper context.</p> <p>6   Q.   When Mr. Vossart was managing</p> <p>7   director of CFT, what company was he</p> <p>8   employed by?</p> <p>9   A.   I don't know.</p> <p>10   Q.   It's not the same as Angela Chan?</p> <p>11   A.   You used the term employment,</p> <p>12   but I don't know if he actually had a contract</p> <p>13   with the legal entity.</p> <p>14   Q.   I'm not talking about presently.</p> <p>15   I'm talking about when he was managing</p> <p>16   director. Do you understand that?</p> <p>17   A.   That's right. When he was the</p> <p>18   managing director, at that time he was</p> <p>19   president of Chargeurs Entoilage and he was</p> <p>20   present of Fitexin.</p> <p>21   Q.   What does Chargeurs Entoilage do?</p> <p>22   A.   It's a holding company which is</p> <p>23   at the head of the CFT division.</p> <p>24   Q.   Does it manufacture interlining?</p> <p>25   A.   No.</p>	<p>1                   Defait</p> <p>2   sign the records of the shareholder</p> <p>3   meetings, the minutes of the shareholder</p> <p>4   meetings. They're also consultant with</p> <p>5   regard to decisions affecting the shareholders</p> <p>6   because, for example, if the president wants</p> <p>7   to change a bylaw, the shareholders have to</p> <p>8   agree with him on any decisions he takes, so</p> <p>9   it's a decisionmaking process by the</p> <p>10   shareholders which is governed by the law,</p> <p>11   so Chargeurs, S.A. has all documents in</p> <p>12   relation to such legal decisions, all the</p> <p>13   corporate documentation.</p> <p>14   Q.   What about non-legal documents</p> <p>15   like e-mails or any other documents that are</p> <p>16   part of Chargeurs Entoilage's files?</p> <p>17       MS. MORGAN: Objection to the</p> <p>18       form. You can answer.</p> <p>19   A.   No. Chargeurs, S.A. doesn't</p> <p>20   have access to the e-mails of Chargeurs</p> <p>21   Entoilage because they have their own server.</p> <p>22   Q.   If Chargeurs, S.A. wanted to</p> <p>23   access the server of Chargeurs Entoilage,</p> <p>24   could it do so?</p> <p>25   A.   No.</p>
Page 99	Page 101
<p>1                   Defait</p> <p>2   Q.   Does it sell interlining?</p> <p>3   A.   No.</p> <p>4   Q.   Does it have any oversight</p> <p>5   responsibilities for companies that</p> <p>6   manufacture or sell interlining?</p> <p>7   A.   I don't know.</p> <p>8   Q.   Why don't you know?</p> <p>9   A.   Because I'm not an employee of</p> <p>10   Chargeurs Entoilage, I'm an employee of</p> <p>11   Chargeurs, S.A., and I don't have all the</p> <p>12   information on Chargeurs Entoilage or its</p> <p>13   subsidiaries.</p> <p>14   Q.   Does Chargeurs, S.A. have the</p> <p>15   ability to obtain records of Chargeurs</p> <p>16   Entoilage?</p> <p>17   A.   What do you mean by records?</p> <p>18   Q.   Documents, papers belonging to</p> <p>19   Chargeurs Entoilage, any business, financial,</p> <p>20   legal papers kept by Chargeurs Entoilage.</p> <p>21       MS. MORGAN: Objection to form.</p> <p>22       You can answer.</p> <p>23   A.   So in respect of what are legal</p> <p>24   documents, yes, because Chargeurs, S.A. is a</p> <p>25   shareholder of Chargeurs Entoilage, so they</p>	<p>1                   Defait</p> <p>2       THE WITNESS: No, no.</p> <p>3       THE INTERPRETER: I thought I</p> <p>4   heard no.</p> <p>5       THE WITNESS: No, no.</p> <p>6       THE INTERPRETER: Oh, I heard</p> <p>7   something. Okay. The interpreter did</p> <p>8   not hear no.</p> <p>9   A.   If Chargeurs, S.A. wanted access</p> <p>10   to the e-mails, they would have to ask</p> <p>11   Angela Chan who would take a decision on</p> <p>12   that request.</p> <p>13   Q.   Could Angela Chan say no if she</p> <p>14   wanted?</p> <p>15       MS. MORGAN: Objection to the</p> <p>16       form. Hypothetical. You can answer.</p> <p>17   A.   It is indeed a hypothetical</p> <p>18   case, but she can say no. She is the</p> <p>19   managing director of Chargeurs Entoilage and</p> <p>20   she has all the powers to act on behalf of</p> <p>21   Chargeurs Entoilage and say no.</p> <p>22   Q.   If Chargeurs, S.A. wanted to</p> <p>23   access documents from Chargeurs Entoilage</p> <p>24   and Ms. Chan said no, could Chargeurs, S.A.</p> <p>25   still make her provide those documents to</p>



Page 102	Page 104
<p>1                   Defait</p> <p>2   Chargeurs, S.A.?</p> <p>3       MS. MORGAN: Objection to the</p> <p>4       form. You can answer.</p> <p>5       A.   No. If she doesn't want, then</p> <p>6       she's free to say no.</p> <p>7       Q.   If Chargeurs, S.A. still wanted</p> <p>8       those documents, would they have to go through</p> <p>9       the court system to get them?</p> <p>10      A.   It's a very theoretical question,</p> <p>11      but yes.</p> <p>12      Q.   Would there be any other way for</p> <p>13      Chargeurs, S.A. to access those documents</p> <p>14      other than going through the court systems?</p> <p>15      A.   Yes.</p> <p>16      Q.   Court system. Excuse me.</p> <p>17      A.   If Angela Chan firmly denied</p> <p>18      access, opposed any access to the documents,</p> <p>19      one way that Chargeurs, S.A. could try to</p> <p>20      gain access anyway would be by changing the</p> <p>21      president of Chargeurs Entoilage.</p> <p>22      Q.   What does Fitexin do?</p> <p>23      A.   Its role is it acts as the</p> <p>24      mother company with shareholdings in various</p> <p>25      companies belonging to the CFT division.</p>	<p>1                   Defait</p> <p>2       made a mistake. Sorry.</p> <p>3       A.   Angela.</p> <p>4       Q.   She is both the president of</p> <p>5       Fitexin and Chargeurs Entoilage I think you</p> <p>6       said?</p> <p>7       A.   That's right.</p> <p>8       Q.   Does Chargeurs, S.A. have the</p> <p>9       ability to obtain records of Fitexin if it</p> <p>10      wants to?</p> <p>11      A.   What kinds of documents?</p> <p>12      Q.   The same type of documents we</p> <p>13      discussed earlier.</p> <p>14      MS. MORGAN: Objection to the</p> <p>15      form. You can answer.</p> <p>16      Q.   When I say that, do you understand</p> <p>17      I mean the legal business, financial</p> <p>18      documents and e-mail records, the same types</p> <p>19      of documents we discussed in connection with</p> <p>20      Chargeurs Entoilage?</p> <p>21      A.   In terms of the legal documents,</p> <p>22      the only documents that one can get, they</p> <p>23      can get are the documents from the -- are</p> <p>24      the decisions of the supervisory board of</p> <p>25      Fitexin.</p>
Page 103	Page 105
<p>1                   Defait</p> <p>2       Q.   What do you mean by the mother</p> <p>3       company?</p> <p>4       A.   It's a company that owns shares</p> <p>5       of the various subsidiaries and it's in</p> <p>6       contrast to the subsidiary companies. You</p> <p>7       have the parent company on the one hand and</p> <p>8       the subsidiaries on the other.</p> <p>9       Q.   Does it manufacture interlining?</p> <p>10      A.   Fitexin?</p> <p>11      Q.   Yes.</p> <p>12      A.   No. It's a holding company.</p> <p>13      Q.   Does it sell interlining?</p> <p>14      A.   No, they don't.</p> <p>15      Q.   Does it have any oversight</p> <p>16      responsibility with respect to companies</p> <p>17      that do manufacture or sell interlining?</p> <p>18      A.   I don't know.</p> <p>19      Q.   Why not?</p> <p>20      A.   Because I'm not an employee of</p> <p>21      Fitexin and I don't know how they are --</p> <p>22      what their structure is.</p> <p>23      Q.   Who is the highest ranking</p> <p>24      employee of Fitexin?</p> <p>25      THE INTERPRETER: The interpreter</p>	<p>1                   Defait</p> <p>2       Q.   Who is on the supervisory board?</p> <p>3       A.   Chargeurs Entoilage and</p> <p>4       Chargeurs Boissy.</p> <p>5       Q.   Are there certain persons on the</p> <p>6       supervisory board?</p> <p>7       A.   Certain persons in what sense?</p> <p>8       Physical persons?</p> <p>9       Q.   Humans.</p> <p>10      A.   Yes. There is Joelle Fabre-</p> <p>11      Hoffmeister who represents Chargeurs, S.A.</p> <p>12      and then there is Olivier Buquen who</p> <p>13      represents Chargeurs Boissy.</p> <p>14      Q.   So I just want to make sure the</p> <p>15      record is clear. The supervisory board for</p> <p>16      Fitexin has one representative from</p> <p>17      Chargeurs, S.A. and one representative from</p> <p>18      Boissy; is that right?</p> <p>19      A.   That's right.</p> <p>20      Q.   And what is the responsibility</p> <p>21      of the supervisory board?</p> <p>22      A.   The president of Fitexin has all</p> <p>23      powers to engage in any types of commitments</p> <p>24      on behalf of the company in respect to third</p> <p>25      parties. However, for purely internal</p>

Page 106	Page 108
<p>1                   Defait</p> <p>2    decisionmaking purposes, Angela Chan has to</p> <p>3    get a decision from the supervisory board</p> <p>4    and their decision on those internal issues.</p> <p>5       Q.   Which kinds --</p> <p>6       A.   Which are not --</p> <p>7       Q.   Sorry.</p> <p>8       A.   Which are not directly -- which</p> <p>9    are not directly -- where she cannot directly</p> <p>10   act on them in regard to third parties.</p> <p>11       There's a clarification. The</p> <p>12   decisions of the supervisory board cannot be</p> <p>13   enacted directly in relation to third</p> <p>14   parties. It's only for internal decisions.</p> <p>15       Q.   What types of internal decisions</p> <p>16   does the president of Fitexin need to secure</p> <p>17   approval from the supervisory board regarding?</p> <p>18       A.   In relation to acquisitions to</p> <p>19   investments that fall above a certain</p> <p>20   threshold to changing internal auditors of</p> <p>21   the company, changes to the bylaws, in</p> <p>22   relation to the appointment of the president</p> <p>23   of the company and in relation to the</p> <p>24   company's activities, scope of activities.</p> <p>25       Q.   When you say appointment of the</p>	<p>1                   Defait</p> <p>2       A.   You would have to ask Angela Chan</p> <p>3    for that.</p> <p>4       Q.   You mentioned earlier that</p> <p>5    Chargeurs Entoilage has its own server.</p> <p>6    Does Fitexin share that server or does it</p> <p>7    have its own?</p> <p>8       A.   I don't know. When I said</p> <p>9    before that Chargeurs Entoilage had its own</p> <p>10   server, it was simply in contrast to the</p> <p>11   server of Chargeurs, S.A. but I don't know</p> <p>12   how their IT system is organized at present.</p> <p>13       Q.   If Chargeurs, S.A. wanted to</p> <p>14   access certain documents belonging to</p> <p>15   Fitexin over Angela Chan's objections, could</p> <p>16   it change the president of Fitexin?</p> <p>17       A.   I don't know.</p> <p>18       Q.   Are you done with your answer?</p> <p>19       MR. D'ANGELO: Eric, can we get</p> <p>20   a translation?</p> <p>21       A.   I don't know. From a legal</p> <p>22   standpoint, I don't know.</p> <p>23       Q.   Are there any other ways that</p> <p>24   Chargeurs, S.A. could get ahold of documents</p> <p>25   other than by -- strike that.</p>
Page 107	Page 109
<p>1                   Defait</p> <p>2    president, do you mean appointment of her</p> <p>3    successor, of Ms. Chan's successor or the</p> <p>4    president of some other organization?</p> <p>5       A.   Of the company and of any</p> <p>6    subsidiary held by the company, if I correctly</p> <p>7    remember the bylaws of the company.</p> <p>8       Q.   So you mean any subsidiary of</p> <p>9    Fitexin; is that right?</p> <p>10       A.   Right. That's right.</p> <p>11       Q.   Does the supervisory board meet</p> <p>12   on a regular basis?</p> <p>13       A.   No. Not unless they're called</p> <p>14   on to meet in relation to the decisions, the</p> <p>15   types of decisions that I've just described.</p> <p>16   Since it was created, the supervisory board</p> <p>17   has only met once.</p> <p>18       Q.   When was it created?</p> <p>19       A.   It was either the end of 2017 or</p> <p>20   the beginning of 2018. I can't remember the</p> <p>21   exact date.</p> <p>22       Q.   Other than the decisions of the</p> <p>23   supervisory board, if Chargeurs, S.A. wanted</p> <p>24   to obtain any other documents of Fitexin,</p> <p>25   could it do so?</p>	<p>1                   Defait</p> <p>2       Other than by asking Ms. Chan</p> <p>3    for Fitexin documents, are there any other</p> <p>4    ways that Chargeurs, S.A. could obtain</p> <p>5    Fitexin documents?</p> <p>6       MS. MORGAN: Objection to the</p> <p>7    form to the extent it calls for a legal</p> <p>8    conclusion. Otherwise, you can answer</p> <p>9    it.</p> <p>10       A.   In actual deed, in fact,</p> <p>11   Chargeurs, S.A. could ask an employee of</p> <p>12   Fitexin.</p> <p>13       Q.   Are you aware of the fact that</p> <p>14   certain documents have been exchanged by the</p> <p>15   parties in this lawsuit?</p> <p>16       A.   When you say parties, which ones</p> <p>17   are you referring to since several are</p> <p>18   involved in this?</p> <p>19       Q.   I'm referring to the fact that</p> <p>20   Chargeurs, S.A. gathered certain documents</p> <p>21   to provide to Hickey Freeman and Veratex.</p> <p>22       A.   No. That is not the case.</p> <p>23       Q.   Chargeurs, S.A. did not gather</p> <p>24   any documents?</p> <p>25       A.   Certain documents from who?</p>

Page 110	Page 112
<p>1 Defait</p> <p>2 Q. Let's take a look at Exhibit 1,</p> <p>3 please. And turn to the last page, please,</p> <p>4 paragraph 23, last page. Do you see that,</p> <p>5 Ms. Defait? Paragraph 23. Do you see that?</p> <p>6 Yes or no?</p> <p>7 A. Yes.</p> <p>8 Q. That's one of the topics that we</p> <p>9 noticed for your deposition; correct?</p> <p>10 A. Yes.</p> <p>11 Q. I'm going to read that topic.</p> <p>12 It says Chargeurs' efforts to locate</p> <p>13 information, e-mails and documents</p> <p>14 responsive to Hickey Freeman's document</p> <p>15 requests, and any responsive documents or</p> <p>16 information that have been or will be withheld.</p> <p>17 Do you see that?</p> <p>18 (Witness reviewing document.)</p> <p>19 Q. Do you see that?</p> <p>20 A. Yes.</p> <p>21 Q. What did you do to prepare to</p> <p>22 testify about this topic?</p> <p>23 MS. MORGAN: And you can answer</p> <p>24 that except to the extent that it</p> <p>25 involves any discussions with counsel,</p>	<p>1 Defait</p> <p>2 A. No.</p> <p>3 Q. Did Chargeurs undertake to</p> <p>4 locate documents from Fitexin?</p> <p>5 A. No.</p> <p>6 Q. Why not?</p> <p>7 A. Because Fitexin documents</p> <p>8 concern Fitexin and not Chargeurs, S.A.</p> <p>9 Q. Did anyone ask Angela Chan to</p> <p>10 obtain those documents?</p> <p>11 A. Who is anyone?</p> <p>12 Q. Anyone from Chargeurs, S.A.</p> <p>13 A. No. Not to my knowledge.</p> <p>14 Q. Did anyone from Chargeurs, S.A.</p> <p>15 undertake to gather documents from Wujiang?</p> <p>16 A. No.</p> <p>17 Q. Why not?</p> <p>18 A. Because documents from LP Wujiang</p> <p>19 only concern LP Wujiang and not Chargeurs, S.A.</p> <p>20 Q. Does Wujiang have its own server?</p> <p>21 A. I don't know.</p> <p>22 Q. Do you know if anyone representing</p> <p>23 Chargeurs, S.A. undertook to gather documents</p> <p>24 from Wujiang?</p> <p>25 MS. MORGAN: You mean legally</p>
Page 111	Page 113
<p>1 Defait</p> <p>2 Fox Rothschild.</p> <p>3 MR. D'ANGELO: Well, the</p> <p>4 preparation is obviously going to</p> <p>5 involve conversations with Fox</p> <p>6 Rothschild.</p> <p>7 MS. MORGAN: The substance of</p> <p>8 any conversations with Fox Rothschild.</p> <p>9 A. Chargeurs undertook a search of</p> <p>10 the e-mails on its server of certain -- the</p> <p>11 e-mail addresses of certain people at</p> <p>12 Chargeurs, S.A.</p> <p>13 Q. Did it undertake to search</p> <p>14 e-mails on Chargeurs Entoilage's server?</p> <p>15 A. No.</p> <p>16 Q. Why not?</p> <p>17 A. Chargeurs, S.A. doesn't have</p> <p>18 access to the server of Chargeurs Entoilage.</p> <p>19 Q. Could it access documents on the</p> <p>20 server if it wanted to?</p> <p>21 MS. MORGAN: Objection to the</p> <p>22 form. You can answer.</p> <p>23 A. No. They would have to ask</p> <p>24 Angela Chan.</p> <p>25 Q. Did anyone ask Angela Chan?</p>	<p>1 Defait</p> <p>2 representing?</p> <p>3 MR. D'ANGELO: Representing in</p> <p>4 any way.</p> <p>5 A. No.</p> <p>6 Q. No as in they did not or no, you</p> <p>7 don't know?</p> <p>8 A. Not to my knowledge; no.</p> <p>9 Q. What does Wujiang do?</p> <p>10 A. It's an interlining</p> <p>11 manufacturing company.</p> <p>12 Q. Does it sell interlining, too?</p> <p>13 A. Yes. They manufacture it to</p> <p>14 sell it.</p> <p>15 Q. Do they sell interlining itself</p> <p>16 or do they sell through a distributor or</p> <p>17 both?</p> <p>18 A. I don't know how they do their</p> <p>19 sales, I don't know if they have a</p> <p>20 distribution network or not, but I do know</p> <p>21 through this lawsuit that there's a distributor</p> <p>22 called Veratex.</p> <p>23 Q. Do you know if Wujiang sells</p> <p>24 products -- strike that.</p> <p>25 Wujiang manufactures interlining;</p>

Page 114	Page 116
<p>1                   Defait</p> <p>2   right?</p> <p>3       A.   Yes.</p> <p>4       Q.   Does it sell interlining to the</p> <p>5   United States?</p> <p>6       A.   I don't know.</p> <p>7       Q.   Does it sell interlining to</p> <p>8   Canada?</p> <p>9       A.   I suppose they do because</p> <p>10 there's a distributor called Veratex, but I</p> <p>11 don't know what the channels are, whether</p> <p>12 it's from Wujiang straight to Veratex</p> <p>13 directly or through indirect channels.</p> <p>14       Q.   What makes you think it can be</p> <p>15 done through indirect channels?</p> <p>16       A.   I don't -- that's not what I</p> <p>17 think -- I -- in fact, I don't know. I</p> <p>18 don't know.</p> <p>19       Q.   What are Wujiang's parent</p> <p>20 companies?</p> <p>21       A.   I know that Fitexin owns</p> <p>22 LP Wujiang.</p> <p>23       Q.   Is it the only company that owns</p> <p>24 LP Wujiang?</p> <p>25       A.   I know that it's the company</p>	<p>1                   Defait</p> <p>2   Laniere de Picardie (Wujiang) Textiles Co.,</p> <p>3   Ltd. Articles.</p> <p>4               Do you see that?</p> <p>5       A.   Yes.</p> <p>6       Q.   Did you see this document at all</p> <p>7   when you prepared for today's deposition?</p> <p>8       A.   No.</p> <p>9       Q.   Are you sure?</p> <p>10       A.   Yes.</p> <p>11       Q.   Page 2 of the document lists</p> <p>12 shareholders. It says the shareholding</p> <p>13 parties are Party A, Fitexin.</p> <p>14               Do you see that?</p> <p>15       A.   Yes.</p> <p>16       Q.   And Party B, Intisselchina</p> <p>17 Limited.</p> <p>18               Do you see that?</p> <p>19       A.   I see.</p> <p>20       Q.   And then turn to page 3. Toward</p> <p>21 the bottom of the page, it says: Registered</p> <p>22 capital has been contributed by both Party A</p> <p>23 and Party B among which Party A holds 78.79%</p> <p>24 of the shares of the company and Party B</p> <p>25 holds 21.21% of the shares of the company.</p>
Page 115	Page 117
<p>1                   Defait</p> <p>2   that owns the majority of the shares, but I</p> <p>3   don't know if there's another company that</p> <p>4   owns a minority of the shares.</p> <p>5       MR. D'ANGELO: Let's mark the</p> <p>6   next exhibit, I think it's 3.</p> <p>7       (Chargeurs Exhibit 3, Lainiere</p> <p>8   de Picardie (Wujiang) Textiles Co.,</p> <p>9   Ltd. Articles bearing production</p> <p>10 numbers LDP003928-LDP003942, in Chinese</p> <p>11 and English, plus translation</p> <p>12 certification, marked for</p> <p>13 identification, as of this date.)</p> <p>14       Q.   Exhibit 3 is a document Bates</p> <p>15 stamped LDP003928 through LDP003942, the</p> <p>16 document was originally produced in Chinese</p> <p>17 and the exhibit consists of a Chinese</p> <p>18 original and an English translation and the</p> <p>19 translation certification.</p> <p>20       Have you ever seen this document?</p> <p>21       A.   No.</p> <p>22       Q.   Look at the first page there.</p> <p>23 The first paragraph -- excuse me. The</p> <p>24 second page of the document. Strike that.</p> <p>25 First page of the document. It says check</p>	<p>1                   Defait</p> <p>2               Do you see that?</p> <p>3       A.   Yes, I do.</p> <p>4       Q.   Is it true that LP Wujiang is</p> <p>5   owned 78.79% by Fitexin and 21.21% by</p> <p>6   Intissel China limited?</p> <p>7       A.   It's the first time that I see</p> <p>8   this document.</p> <p>9               (Witness reviewing document.)</p> <p>10       A.   This is part of the bylaws of</p> <p>11 the company. I don't know if they are</p> <p>12 extant. If they are in force, then the</p> <p>13 sentence must be true.</p> <p>14       Q.   You don't know for sure though?</p> <p>15       A.   It's a Chinese document produced</p> <p>16 by a Chinese company, so I'm not specifically</p> <p>17 sure if the document is extant, and,</p> <p>18 therefore, I'm not sure if it has value as</p> <p>19 an official document, if it is valid.</p> <p>20       Q.   Can you refer back to Exhibit 1,</p> <p>21 please? Turn to page 2, please.</p> <p>22               Toward the bottom of the page,</p> <p>23 Topic 3, do you see that? Ms. Defait, do</p> <p>24 you see that?</p> <p>25               THE INTERPRETER: Page 2?</p>

30 (Pages 114 to 117)

Page 118	Page 120
<p>1 Defait</p> <p>2 MR. D'ANGELO: Maybe it's the</p> <p>3 second page 2 of the document. Keep</p> <p>4 flipping.</p> <p>5 Q. Sorry. It should be the page</p> <p>6 after that one.</p> <p>7 Do you see it says number 2 at</p> <p>8 the bottom? So that's numbered page 2, but</p> <p>9 it's actually page 4 of the exhibit; correct?</p> <p>10 A. Yes.</p> <p>11 Q. And Topic 3, it says: The</p> <p>12 owners, shareholders, members or partners of</p> <p>13 Lainiere Textiles.</p> <p>14 Do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. What did you do to prepare to</p> <p>17 testify about that topic?</p> <p>18 A. I looked at the legal chart,</p> <p>19 diagram of Chargeurs, S.A.</p> <p>20 Q. Did that diagram say the same</p> <p>21 thing as what's reflected in Exhibit 3</p> <p>22 regarding the ownership of Wujiang?</p> <p>23 A. Yes, I remember it, but it's</p> <p>24 quite a complex diagram, and, therefore,</p> <p>25 while it seems that I saw it, it's hard to</p>	<p>1 Defait</p> <p>2 Strike that.</p> <p>3 Has LP Wujiang ever manufactured</p> <p>4 the Model 3069 interlining?</p> <p>5 A. Yes.</p> <p>6 Q. Does it still?</p> <p>7 A. I don't know.</p> <p>8 Q. Did it manufacture that</p> <p>9 interlining in 2016 and 2017?</p> <p>10 A. I don't know exactly. I don't</p> <p>11 know.</p> <p>12 Q. What periods of time do you know</p> <p>13 that that model interlining was manufactured</p> <p>14 by Wujiang?</p> <p>15 A. When they manufactured the lot,</p> <p>16 that is at issue in the Hickey Freeman</p> <p>17 lawsuit.</p> <p>18 Q. What lot is that?</p> <p>19 A. I don't know.</p> <p>20 Q. Do you know if there was more</p> <p>21 than one lot at issue?</p> <p>22 A. Yes, I heard some mention of</p> <p>23 several lots.</p> <p>24 Q. Wujiang manufactured those lots?</p> <p>25 A. Yes.</p>
Page 119	Page 121
<p>1 Defait</p> <p>2 ascertain that entirely.</p> <p>3 Q. If you can turn to the last page</p> <p>4 of Exhibit 1, please, going back to Topic 23</p> <p>5 on the bottom. I have a very specific</p> <p>6 question with respect to that topic, which</p> <p>7 is what did you do to prepare to testify</p> <p>8 about that topic?</p> <p>9 MS. MORGAN: And I'll direct you</p> <p>10 not to disclose any conversations that</p> <p>11 you had with Fox Rothschild.</p> <p>12 MR. D'ANGELO: Do you mean the</p> <p>13 contents of any conversations?</p> <p>14 MS. MORGAN: Yes.</p> <p>15 A. I had a conversation with Joelle</p> <p>16 Fabre-Hoffmeister, with Francois Rousseau,</p> <p>17 with Olivier Buquen and with Fox Rothschild</p> <p>18 and I looked at some of my files.</p> <p>19 Q. Have you ever heard of the Model</p> <p>20 3069 interlining?</p> <p>21 A. No. Only in the framework of</p> <p>22 this lawsuit.</p> <p>23 Q. Okay.</p> <p>24 Does LP Wujiang manufacture the</p> <p>25 Model 3069?</p>	<p>1 Defait</p> <p>2 Q. Are you familiar with the</p> <p>3 company Lainière de Picardie S.A.S.?</p> <p>4 A. Yes.</p> <p>5 Q. It's 100% owned by Fitexin; right?</p> <p>6 A. Yes.</p> <p>7 Q. Have you ever heard of the</p> <p>8 company Lainière de Picardie, Inc.?</p> <p>9 A. Yes.</p> <p>10 Q. It's 100% owned by Fitexin;</p> <p>11 correct?</p> <p>12 A. If my recollection of the legal</p> <p>13 diagram is correct, then yes, it is completely</p> <p>14 owned by Fitexin.</p> <p>15 MR. D'ANGELO: Let's take a</p> <p>16 break.</p> <p>17 (Whereupon, a recess was taken.)</p> <p>18 CONTINUED BY MR. D'ANGELO:</p> <p>19 Q. Ms. Defait, you understand</p> <p>20 you're still under oath; correct?</p> <p>21 A. Yes.</p> <p>22 Q. You mentioned earlier that in</p> <p>23 order to obtain documents in connection with</p> <p>24 this litigation, that Chargeurs, S.A.</p> <p>25 undertook to search e-mails on its own</p>



Page 122	Page 124
<p>1 Defait</p> <p>2 server; is that right?</p> <p>3 A. That's right.</p> <p>4 Q. Are there any other legal</p> <p>5 entities or companies besides Chargeurs, S.A.</p> <p>6 whose documents are located on that same</p> <p>7 server?</p> <p>8 A. Yes. Those would be documents</p> <p>9 that we have received attached to e-mails,</p> <p>10 by e-mails on the same server.</p> <p>11 Q. Those would be attachments to</p> <p>12 e-mails received by Chargeurs, S.A. employees;</p> <p>13 correct?</p> <p>14 THE INTERPRETER: The</p> <p>15 interpreter added the word attached,</p> <p>16 sorry.</p> <p>17 Q. Let's -- let me reask the</p> <p>18 original question.</p> <p>19 Are there any other legal</p> <p>20 entities or companies besides Chargeurs,</p> <p>21 S.A. whose e-mails would be on that same or</p> <p>22 located on that same server?</p> <p>23 MR. D'ANGELO: What did the</p> <p>24 witness ask?</p> <p>25 THE INTERPRETER: Just to repeat</p>	<p>1 Defait</p> <p>2 records of employees of Chargeurs, S.A.;</p> <p>3 correct?</p> <p>4 A. Yes.</p> <p>5 Q. So if employees of Chargeurs,</p> <p>6 S.A. received e-mails from other people who</p> <p>7 don't work for Chargeurs, S.A., those e-mails</p> <p>8 would be on the system; correct? On the</p> <p>9 server. Excuse me.</p> <p>10 A. Yes.</p> <p>11 Q. Apart from that, do any other</p> <p>12 companies have their e-mails on the</p> <p>13 Chargeurs, S.A. server?</p> <p>14 A. Let me just -- as far as I know,</p> <p>15 Chargeurs, S.A. and Chargeurs Boissy share a</p> <p>16 common server.</p> <p>17 Q. Are there any other companies</p> <p>18 that you're aware of that share that same</p> <p>19 server other than Chargeurs, S.A. and</p> <p>20 Chargeurs Boissy?</p> <p>21 A. To my knowledge, no other</p> <p>22 company in any case, no other company except</p> <p>23 for the division, the Chargeurs division</p> <p>24 which is CFT or the Film Protection division</p> <p>25 or the Chargeurs Technological Substrates</p>
Page 123	Page 125
<p>1 Defait</p> <p>2 exactly the question by the interpreter.</p> <p>3 MR. D'ANGELO: All right.</p> <p>4 (Interpreter repeats question.)</p> <p>5 A. These are e-mails received by</p> <p>6 other companies other than Chargeurs, S.A.</p> <p>7 on the Chargeurs, S.A. server.</p> <p>8 Q. What other companies have</p> <p>9 e-mails which they received which are</p> <p>10 located on the Chargeurs, S.A. server?</p> <p>11 MS. MORGAN: They meaning</p> <p>12 Chargeurs, S.A.?</p> <p>13 MR. D'ANGELO: No. I mean other</p> <p>14 companies.</p> <p>15 Q. Do you understand the question?</p> <p>16 A. I prefer to have it reconfirmed</p> <p>17 to me to make sure I understand.</p> <p>18 Q. Chargeurs, S.A. has a server;</p> <p>19 correct?</p> <p>20 A. Yes.</p> <p>21 Q. On that server are located</p> <p>22 certain documents belonging to Chargeurs,</p> <p>23 S.A.; correct?</p> <p>24 A. Yes.</p> <p>25 Q. That server also has the e-mail</p>	<p>1 Defait</p> <p>2 division.</p> <p>3 MR. D'ANGELO: I think the witness</p> <p>4 is indicating that she senses something</p> <p>5 is inaccurate about the answer.</p> <p>6 A. All the entities that are part</p> <p>7 of the CFT, all the entities that are part</p> <p>8 of Chargeurs Protective Film and all the</p> <p>9 entities that are part of Senfa and</p> <p>10 Chargeurs Technological Substrates, all of</p> <p>11 those do not share the same server as</p> <p>12 Chargeurs, S.A. and Chargeurs Boissy.</p> <p>13 Q. So just to be clear, the</p> <p>14 entities that comprise the CFT division,</p> <p>15 those entities do not share the same server</p> <p>16 as Chargeurs, S.A. and Chargeurs Boissy;</p> <p>17 correct?</p> <p>18 A. That's right.</p> <p>19 Q. Wujiang shares the same server</p> <p>20 as Chargeurs, S.A. and Chargeurs Boissy?</p> <p>21 A. No.</p> <p>22 Q. Does Wujiang share a server with</p> <p>23 any other legal entity to the best of your</p> <p>24 knowledge?</p> <p>25 A. I do not know.</p>

32 (Pages 122 to 125)



Page 126	Page 128
<p>1                   Defait</p> <p>2           Q.   Did Chargeurs, S.A. undertake to</p> <p>3   search the server of Wujiang to find</p> <p>4   documents in connection with this litigation?</p> <p>5           A.   No.</p> <p>6           Q.   Other than searching the server</p> <p>7   shared by Chargeurs, S.A. and Chargeurs</p> <p>8   Boissy, did Chargeurs, S.A. undertake to</p> <p>9   search any other servers in connection with</p> <p>10   this litigation for documents to provide to</p> <p>11   Hickey Freeman?</p> <p>12          A.   No.</p> <p>13          Q.   Did Chargeurs S.A. do anything</p> <p>14   to gather documents from Wujiang to provide</p> <p>15   to Hickey Freeman as part of this litigation?</p> <p>16          A.   No.</p> <p>17          Q.   Did Wujiang search its own</p> <p>18   documents to find documents to give to</p> <p>19   Hickey Freeman as part of this litigation</p> <p>20   and provide them to Chargeurs, S.A. or</p> <p>21   Chargeurs S.A.'s attorneys?</p> <p>22          A.   I don't know what LP Wujiang did</p> <p>23   in the context of this lawsuit, but I know</p> <p>24   that Chargeurs Boissy didn't receive any</p> <p>25   documents from LP Wujiang in the context of</p>	<p>1                   Defait</p> <p>2           MS. MORGAN: Objection to the</p> <p>3   form as mischaracterizing the testimony.</p> <p>4   You can answer.</p> <p>5           A.   No, I don't know.</p> <p>6           Q.   Let's go back to Exhibit 2,</p> <p>7   please. It's the registration document.</p> <p>8   No, Exhibit 2 is the registration document.</p> <p>9           A.   Oh, sorry. Okay.</p> <p>10          Q.   Thanks. That's quite all right.</p> <p>11                And if I can direct your</p> <p>12   attention to page 218, please. And on the</p> <p>13   top of the page, it says Relationships</p> <p>14   Between Chargeurs and Its Subsidiaries.</p> <p>15                Do you see that?</p> <p>16          A.   Yes, I do.</p> <p>17          Q.   And do you see where it says</p> <p>18   8.1.2?</p> <p>19          A.   Yes.</p> <p>20          Q.   It says Role of the Chargeurs</p> <p>21   Parent Company in the Group.</p> <p>22          A.   I see it.</p> <p>23          Q.   And it shows as the parent</p> <p>24   company, that refers to Chargeurs, S.A.;</p> <p>25   correct?</p>
Page 127	Page 129
<p>1                   Defait</p> <p>2   this lawsuit.</p> <p>3           Q.   Did Chargeurs S.A.'s attorneys</p> <p>4   receive any documents from Wujiang over the</p> <p>5   course of this lawsuit to provide to Hickey</p> <p>6   Freeman?</p> <p>7           MS. MORGAN: Objection to form.</p> <p>8           You can answer.</p> <p>9           A.   LP Wujiang shows the same lawyer</p> <p>10   with Chargeurs, S.A. wanted to access and,</p> <p>11   therefore, LP Wujiang certainly provided</p> <p>12   documents to Fox Rothschild in the context</p> <p>13   of this lawsuit.</p> <p>14          Q.   So you're saying that Wujiang</p> <p>15   provided documents directly to Fox Rothschild</p> <p>16   as part of this litigation? Is that what</p> <p>17   you're saying?</p> <p>18          MS. MORGAN: Objection to the</p> <p>19   form. You can answer.</p> <p>20          A.   The documents were not provided</p> <p>21   to Chargeurs, S.A., but they were most</p> <p>22   probably provided to Fox Rothschild.</p> <p>23          Q.   Do you know what steps Wujiang</p> <p>24   undertook to find documents to provide to</p> <p>25   Fox Rothschild as part of this litigation?</p>	<p>1                   Defait</p> <p>2           A.   Yes.</p> <p>3           Q.   And underneath that it says:</p> <p>4   The Chargeurs parent company acts as a</p> <p>5   holding company for the group's companies.</p> <p>6                Do you see that?</p> <p>7           A.   I see; yes.</p> <p>8           Q.   And then it lists several ways</p> <p>9   in which Chargeurs, S.A. does that; correct?</p> <p>10          A.   That's right.</p> <p>11          Q.   And when it says it acts as</p> <p>12   holding company for the group's companies,</p> <p>13   is it referring to certain companies within</p> <p>14   the Chargeurs group or all the companies</p> <p>15   within the Chargeurs group?</p> <p>16          A.   You're referring to the sentence</p> <p>17   that says it acts as holding company for the</p> <p>18   group's companies?</p> <p>19          Q.   Correct.</p> <p>20          A.   Yes. In this paragraph, the</p> <p>21   companies of the group comprise those whose</p> <p>22   shares are owned by Chargeurs, S.A. and its</p> <p>23   subsidiaries.</p> <p>24          Q.   If I can direct your attention</p> <p>25   to the second bullet point under that sentence,</p>

Page 130	Page 132
<p>1                   Defait</p> <p>2   it says Managing Central Functions followed</p> <p>3   by a colon, and then it has several examples.</p> <p>4       Do you see that?</p> <p>5       A.   Yes, I see it.</p> <p>6       Q.   I just want to take those one by</p> <p>7   one if we can.</p> <p>8       How does Chargeurs, S.A. manage</p> <p>9   the group's business strategy?</p> <p>10       MS. MORGAN: Objection to the</p> <p>11   form. You can answer.</p> <p>12       A.   Are you talking about a</p> <p>13   commercial strategy, a sales strategy?</p> <p>14       Q.   I think that might be the second</p> <p>15   example which is marketing strategy.</p> <p>16       To your mind, is there a</p> <p>17   difference between business strategy and</p> <p>18   marketing strategy?</p> <p>19       MR. D'ANGELO: Was there a</p> <p>20   question posed by the witness?</p> <p>21       A.   You mean the sales strategy and</p> <p>22   the marketing strategy?</p> <p>23       Q.   Well, I'm using the terminology</p> <p>24   written here, it says the group's business,</p> <p>25   marketing strategy. I want to know as you</p>	<p>1                   Defait</p> <p>2       or prior to filing?</p> <p>3       MR. D'ANGELO: At the time that</p> <p>4   she read it and didn't take issue with</p> <p>5   it.</p> <p>6       A.   Chargeurs defines a strategy, a</p> <p>7   broad strategy for which it promulgates, so</p> <p>8   if that's what you mean by manage, then yes,</p> <p>9   that's what -- indeed that's what Chargeurs</p> <p>10   does, but the actual strategies are defined</p> <p>11   by the divisions, within the divisions, and</p> <p>12   the general managers of the divisions are</p> <p>13   the ones who defined -- who managed strategy</p> <p>14   for themselves.</p> <p>15       Q.   How, if in any way, does</p> <p>16   Chargeurs, S.A. control the operations of</p> <p>17   the group?</p> <p>18       A.   So it really depends what you</p> <p>19   mean by control and by operations.</p> <p>20   Chargeurs does not intervene in the daily</p> <p>21   workings, the daily management of subsidiaries</p> <p>22   or the strategies that are set by the</p> <p>23   managers of the subsidiaries, so it would</p> <p>24   really depend what you mean by control.</p> <p>25       Q.   This section says the Chargeurs</p>
Page 131	Page 133
<p>1                   Defait</p> <p>2   use those terms, is there a difference</p> <p>3   between business strategy and marketing</p> <p>4   strategy?</p> <p>5       A.   I think that group business</p> <p>6   strategy is very general, a very broad --</p> <p>7   encompasses a very broad -- very broad axes,</p> <p>8   whereas marketing strategy refers to marketing</p> <p>9   and sales more concisely.</p> <p>10       Q.   How, if in any way, does</p> <p>11   Chargeurs, S.A. manage the group's business</p> <p>12   strategy?</p> <p>13       A.   It all depends on what you mean</p> <p>14   by managing -- manage, because Chargeurs,</p> <p>15   S.A. doesn't manage the strategy of its</p> <p>16   subsidiaries.</p> <p>17       Q.   You read this document before it</p> <p>18   was filed with the AMF, didn't you?</p> <p>19       A.   That's right.</p> <p>20       Q.   Did you suggest to anyone that</p> <p>21   this part of the document should be changed?</p> <p>22       A.   No.</p> <p>23       Q.   When you read this portion of</p> <p>24   the document, did it seem accurate to you?</p> <p>25       MS. MORGAN: You mean right now</p>	<p>1                   Defait</p> <p>2   parent company acts as a holding company for</p> <p>3   the group's companies. I asked you what the</p> <p>4   group's companies mean. You told me all the</p> <p>5   subsidiaries that are within the Chargeurs</p> <p>6   group, not only direct subsidiaries.</p> <p>7       Do you remember telling me that?</p> <p>8       A.   Group's companies?</p> <p>9       Q.   Group's companies.</p> <p>10       A.   Group's companies refers to the</p> <p>11   subsidiaries of Chargeurs, S.A. as well as</p> <p>12   the subsidiaries of its subsidiaries.</p> <p>13       Q.   So after that statement, it says</p> <p>14   managing, in the second bullet point, it</p> <p>15   says managing central functions followed by</p> <p>16   a colon and then one of the items listed is</p> <p>17   control of operations.</p> <p>18       Do you see that?</p> <p>19       So I want to know what control</p> <p>20   of operations means here.</p> <p>21       A.   So by control of operations, so</p> <p>22   Chargeurs, S.A. receives from its subsidiaries,</p> <p>23   it receives financial information and</p> <p>24   Chargeurs then verifies that information,</p> <p>25   that's what it does, it has access to it and</p>

Page 134	Page 136
<p>1                   Defait</p> <p>2   it is submitted to Chargeurs, S.A. by its</p> <p>3   direct subsidiaries, but it does not control</p> <p>4   the actions of its subsidiaries, it just</p> <p>5   receives information from them which it then</p> <p>6   checks.</p> <p>7       Q.   What role does Chargeurs, S.A.</p> <p>8   play, if any, in human resources policy,</p> <p>9   which is the next item listed?</p> <p>10   A.   So Chargeurs provides services</p> <p>11   like consulting and services and -- services --</p> <p>12   it provides like advisory services to</p> <p>13   Chargeurs Entoilage, and then -- but it only</p> <p>14   supplies it to Chargeurs Entoilage within</p> <p>15   the CFT division, and in turn Chargeurs</p> <p>16   Entoilage pays for those services, pays a</p> <p>17   fee for those services.</p> <p>18   Q.   Any of those services relate to</p> <p>19   human resources?</p> <p>20   A.   Yes. It provides services that</p> <p>21   are of human resource nature, but in a very</p> <p>22   broad sense. It's mainly advisory service</p> <p>23   and assistance that it provides to key people.</p> <p>24   Q.   I want to know what human</p> <p>25   resources services specifically even if in a</p>	<p>1                   Defait</p> <p>2       A.   Yes, I do.</p> <p>3       Q.   We mentioned that one of the</p> <p>4   topics discussed during that, the roundtable</p> <p>5   discussions there was production processes?</p> <p>6   Do you remember that?</p> <p>7       A.   That's right.</p> <p>8       Q.   Why did Chargeurs, S.A. organize</p> <p>9   a roundtable discussion regarding production</p> <p>10   processes?</p> <p>11   A.   They did it in order to allow</p> <p>12   all the companies in the division, all the</p> <p>13   teams in the division to define this very</p> <p>14   important subject, but all the work was</p> <p>15   conducted by the companies themselves, not</p> <p>16   by Chargeurs, S.A., which restricted itself</p> <p>17   to simply organizing the seminar.</p> <p>18   Q.   This shows that Chargeurs, S.A.</p> <p>19   thought it was important for heads of</p> <p>20   various companies to speak with one another</p> <p>21   about production processes?</p> <p>22   A.   Chargeurs, S.A. identified four</p> <p>23   subject areas among these human resource</p> <p>24   production cells and innovation, it defined</p> <p>25   these subject areas so that the groups</p>
Page 135	Page 137
<p>1                   Defait</p> <p>2   broad sense.</p> <p>3       A.   These services are provided by</p> <p>4   Joelle Fabre-Hoffmeister who has specific</p> <p>5   knowledge in that respect, but I don't know</p> <p>6   exactly the types of services that are</p> <p>7   provided to Chargeurs Entoilage.</p> <p>8       Q.   Does Chargeurs, S.A. play any</p> <p>9   role in the manufacturing processes of any</p> <p>10   CFT subsidiaries?</p> <p>11   A.   No.</p> <p>12       Q.   Does it play any role in</p> <p>13   determining what processes are implemented</p> <p>14   at new factories within the CFT division?</p> <p>15   A.   No.</p> <p>16       Q.   What about in ensuring that</p> <p>17   certain manufacturing processes are followed?</p> <p>18   A.   No. Chargeurs, S.A. never</p> <p>19   intervenes in anything having to do with the</p> <p>20   production by the subsidiaries of Chargeurs</p> <p>21   Entoilage.</p> <p>22       Q.   Do you remember earlier we</p> <p>23   discussed the strategic seminar that</p> <p>24   Chargeurs, S.A. organized for various heads</p> <p>25   of subsidiaries?</p>	<p>1                   Defait</p> <p>2   attending the seminar would be able to</p> <p>3   discuss them.</p> <p>4       Q.   My question was a little</p> <p>5   different, which is: Did Chargeurs think it</p> <p>6   was important for the heads of particular</p> <p>7   companies to speak with one another about</p> <p>8   production processes?</p> <p>9       A.   What's important for Chargeurs</p> <p>10   is to find a strategic vision, a global</p> <p>11   vision, a wider outlook, and for an</p> <p>12   industrial group, the kind of group that it</p> <p>13   is, each subject area is quite important.</p> <p>14       Q.   When you say global outlook,</p> <p>15   what do you mean by that?</p> <p>16       A.   Global outlook comprising these</p> <p>17   four subject areas.</p> <p>18       Q.   What do you mean when you say</p> <p>19   global outlook though? Do you mean having</p> <p>20   more substantial presence globally?</p> <p>21       A.   It's a division that needs to be</p> <p>22   disseminated, it's like an orientation for</p> <p>23   the respective production areas and each</p> <p>24   company then needs to define for itself the</p> <p>25   actions that are possible for it in these</p>

35 (Pages 134 to 137)

Page 138	Page 140
<p>1                   Defait</p> <p>2   four areas. It's part of the game changer</p> <p>3   program.</p> <p>4   Q.   Does Chargeurs, S.A. want to</p> <p>5   make sure that various production processes</p> <p>6   across the globe are consistent with one</p> <p>7   another?</p> <p>8           MR. D'ANGELO: Can you translate</p> <p>9   that portion, please, Eric?</p> <p>10   A.   It depends what you mean by</p> <p>11   consistent. There are four independent</p> <p>12   divisions and they all make products which</p> <p>13   are very different and independent from each</p> <p>14   other, so I would have to understand what</p> <p>15   consistent would mean in that respect.</p> <p>16   Q.   You testified earlier that there</p> <p>17   were heads of various subsidiaries that were</p> <p>18   present at that strategic meeting; correct?</p> <p>19   A.   Yes.</p> <p>20   Q.   That includes heads of various</p> <p>21   subsidiaries within the CFT division?</p> <p>22   A.   I don't remember exactly who was</p> <p>23   present at the seminar, all the people that</p> <p>24   were present at the seminar, but yes, it</p> <p>25   certainly regrouped the heads of these</p>	<p>1                   Defait</p> <p>2                   (Witness reviewing document.)</p> <p>3           MR. D'ANGELO: And while the</p> <p>4   witness is looking, I will note for the</p> <p>5   record that Exhibit 4 is LDP00101</p> <p>6   through 145.</p> <p>7   A.   No, I have not seen this document.</p> <p>8   Q.   Do you know who prepared this</p> <p>9   document?</p> <p>10   A.   No, I don't.</p> <p>11   Q.   Turn to page 131, please. It</p> <p>12   says Worldwide Consistency Everywhere, Same</p> <p>13   Product, Same Guarantees and Same Process.</p> <p>14           Do you see that?</p> <p>15   A.   I see.</p> <p>16   Q.   Do you know what that's in</p> <p>17   reference to?</p> <p>18           THE INTERPRETER: The</p> <p>19   interpreter would like to use a more</p> <p>20   specific term for consistency, just in</p> <p>21   translation of the title.</p> <p>22           MR. D'ANGELO: I'm not a</p> <p>23   translator, so I'm going to have to</p> <p>24   rely on you.</p> <p>25           THE INTERPRETER: Okay.</p>
Page 139	Page 141
<p>1                   Defait</p> <p>2   companies.</p> <p>3   Q.   You said Mr. Lai and Mr. Marlien</p> <p>4   were two people who were present there; is</p> <p>5   that correct?</p> <p>6   A.   That's right.</p> <p>7   Q.   Heads of other CFT subsidiaries,</p> <p>8   did they attend as well?</p> <p>9   A.   I can't remember at this time,</p> <p>10   but there were other people from the sector.</p> <p>11   Q.   Including parts of the sector</p> <p>12   that manufacture products?</p> <p>13   A.   I don't know. I can't recall</p> <p>14   because I didn't participate in the working</p> <p>15   group on production, so I don't know who was</p> <p>16   there.</p> <p>17           MR. D'ANGELO: Let's mark</p> <p>18   Exhibit 4, please.</p> <p>19           (Chargeurs Exhibit 4, Chargeurs</p> <p>20   Interlining 30/04/2014 bearing</p> <p>21   production numbers LDP000101-</p> <p>22   LDP000145, marked for identification,</p> <p>23   as of this date.)</p> <p>24   Q.   Have you seen that document</p> <p>25   before?</p>	<p>1                   Defait</p> <p>2           MR. D'ANGELO: If you want to</p> <p>3   use a more specific term, then go ahead.</p> <p>4   A.   This is the first time I've seen</p> <p>5   this. I can see in the title that there is</p> <p>6   a reference to Chargeurs Interlining --</p> <p>7   Entoilage, and subsequently the name of the</p> <p>8   division was changed to CFT, but I don't</p> <p>9   know what context to fit this page into.</p> <p>10   Q.   You don't know what this means</p> <p>11   on this page, 131?</p> <p>12           MS. MORGAN: Asked and answered.</p> <p>13           You can answer again.</p> <p>14   A.   No, indeed, I don't know what it</p> <p>15   refers to.</p> <p>16   Q.   Could you turn two pages to page</p> <p>17   133. It says Lainiere de Picardie Wujiang,</p> <p>18   China at the top there.</p> <p>19           Do you see that?</p> <p>20   A.   Yes.</p> <p>21   Q.   And then under that it says:</p> <p>22   Wujiang is inspired directly from our</p> <p>23   headquarter.</p> <p>24           Do you see that?</p> <p>25   A.   Yes.</p>

Page 142	Page 144
<p>1 Defait</p> <p>2 Q. Do you know what that is?</p> <p>3 A. No, I'm not the one who wrote</p> <p>4 it. I don't know who wrote it, for what</p> <p>5 purpose was it written or what context, so I</p> <p>6 don't know what it means.</p> <p>7 Q. Do you have any idea what our</p> <p>8 headquarter might mean?</p> <p>9 A. I could only guess that it is</p> <p>10 Chargeurs Entoilage document from 2014, so</p> <p>11 it could be Chargeurs Entoilage, but I don't</p> <p>12 know who produced it.</p> <p>13 Q. Has Chargeurs, S.A. ever</p> <p>14 undertaken to make sure that various</p> <p>15 production processes across various CFT</p> <p>16 manufacturing facilities are similar in any</p> <p>17 way?</p> <p>18 A. Chargeurs, S.A. is a publicly</p> <p>19 listed company, it doesn't intervene in the</p> <p>20 day-to-day management in the subsidiaries or</p> <p>21 the subsidiaries of its subsidiaries and it</p> <p>22 does not intervene in the production processes</p> <p>23 of the same.</p> <p>24 Q. So do you have any idea what it</p> <p>25 means here when it says same production</p>	<p>1 Defait</p> <p>2 MR. D'ANGELO: You want to take</p> <p>3 a break now?</p> <p>4 MS. MORGAN: Yes.</p> <p>5 MR. D'ANGELO: Let's take a break.</p> <p>6 (Whereupon, a brief recess was</p> <p>7 taken.)</p> <p>8 Q. We have marked Exhibits 5 and 6.</p> <p>9 Exhibit 5 is Bates stamped LDP003925-27.</p> <p>10 It's an English translation along with the</p> <p>11 Chinese language original and translation</p> <p>12 certificate. Exhibit 6 is Bates stamped</p> <p>13 LDP003923 through 24, English translation, a</p> <p>14 Chinese language original and a translation</p> <p>15 certificate.</p> <p>16 Ms. Defait, please take a look</p> <p>17 at Exhibits 5 and 6, please. Let me know</p> <p>18 when you've had a chance to take a look at</p> <p>19 them, please.</p> <p>20 (Witness reviewing documents.)</p> <p>21 A. I haven't read everything, but</p> <p>22 I've looked at them.</p> <p>23 Q. Have you seen these documents</p> <p>24 before?</p> <p>25 A. No.</p>
Page 143	Page 145
<p>1 Defait</p> <p>2 process, same products and services?</p> <p>3 A. This is a title in a document,</p> <p>4 it was drafted by a person unknown to me for</p> <p>5 people who I don't know, and it's the first</p> <p>6 time I see it. It's the first time I see</p> <p>7 this title, so I don't know what it refers to.</p> <p>8 Q. You can put that aside then.</p> <p>9 MR. D'ANGELO: Let's mark 5 and</p> <p>10 6.</p> <p>11 (Chargeurs Exhibit 5, English</p> <p>12 translation along with the Chinese</p> <p>13 original and translation certificate</p> <p>14 bearing production numbers LDP003925-</p> <p>15 LDP003927, marked for identification,</p> <p>16 as of this date.)</p> <p>17 (Chargeurs Exhibit 6, English</p> <p>18 translation along with the Chinese</p> <p>19 original and translation certificate</p> <p>20 bearing production numbers LDP003923-</p> <p>21 LDP003924, marked for identification,</p> <p>22 as of this date.)</p> <p>23 MS. MORGAN: Do you know how</p> <p>24 long we'll have on these? Because</p> <p>25 we're at 5 now.</p>	<p>1 Defait</p> <p>2 Q. Were you shown these during your</p> <p>3 preparation for today's deposition?</p> <p>4 A. No.</p> <p>5 Q. Do you know what these documents</p> <p>6 are?</p> <p>7 A. They are documents related to</p> <p>8 quality. They're issued by -- they were</p> <p>9 made by LP Wujiang and they concern quality</p> <p>10 control procedures.</p> <p>11 Q. Do you know if these pertain to</p> <p>12 every model interlining manufactured by</p> <p>13 Wujiang?</p> <p>14 A. Produced by LP Wujiang?</p> <p>15 Q. Correct.</p> <p>16 A. No, I do not know.</p> <p>17 Q. Do you know if these apply</p> <p>18 specifically to the Model 3069 interlining?</p> <p>19 A. No.</p> <p>20 Q. And you see there are some dates</p> <p>21 on the top of both documents? There's a</p> <p>22 declaration number, an enactment date and a</p> <p>23 revision date on the top of each.</p> <p>24 Do you see that?</p> <p>25 A. Yes, I see it.</p>



Page 146	Page 148
<p>1 Defait</p> <p>2 Q. Do you know if either of these</p> <p>3 documents have been revised since the date</p> <p>4 that's indicated on the top?</p> <p>5 A. No, I don't know.</p> <p>6 Q. Do you know if each of these</p> <p>7 procedures discussed in these documents were</p> <p>8 followed over the course of the manufacturing</p> <p>9 of the 3069 interlining that was ultimately</p> <p>10 provided to Hickey Freeman?</p> <p>11 A. No, I don't know.</p> <p>12 MR. D'ANGELO: Let's go ahead</p> <p>13 and mark Exhibits 7 and 8.</p> <p>14 (Chargeurs Exhibit 7, LPWJ Raw</p> <p>15 Material QC Inspection Procedure</p> <p>16 bearing production numbers</p> <p>17 LDP003900-LDP003911, in English and</p> <p>18 Chinese and translation certification,</p> <p>19 marked for identification, as of this</p> <p>20 date.)</p> <p>21 (Chargeurs Exhibit 8, LPWJ</p> <p>22 Finished Product QC Inspection</p> <p>23 Procedure bearing production numbers</p> <p>24 LDP003912-LDP003922, in English and</p> <p>25 Chinese, and translation certification,</p>	<p>1 Defait</p> <p>2 also concerning the raw materials used by --</p> <p>3 inspection of the raw materials used by LP</p> <p>4 Wujiang.</p> <p>5 Q. And do you know who at Wujiang</p> <p>6 prepared these documents?</p> <p>7 A. No.</p> <p>8 Q. Do you know if these QC inspection</p> <p>9 procedures were in place in 2016 and 2017?</p> <p>10 A. No, I don't know.</p> <p>11 Q. Do you know when these were in</p> <p>12 place at all?</p> <p>13 A. No, I don't know.</p> <p>14 Q. Do you know what models of</p> <p>15 interlining, if any, these procedures apply</p> <p>16 to?</p> <p>17 A. No.</p> <p>18 Q. Do you know if these inspection</p> <p>19 procedures apply to the Model 3069 interlining?</p> <p>20 A. I don't know.</p> <p>21 Q. With respect to Exhibits 5, 6, 7</p> <p>22 and 8, all four that I've handed you over</p> <p>23 the past several minutes, do you know if</p> <p>24 anyone at Fitexin played a role in preparing</p> <p>25 any of these documents or approving any of</p>
Page 147	Page 149
<p>1 Defait</p> <p>2 marked for identification, as of this</p> <p>3 date.)</p> <p>4 MR. D'ANGELO: While the witness</p> <p>5 is reviewing these documents, I will</p> <p>6 note for the record that the documents</p> <p>7 are LDP003900-11, it's an English</p> <p>8 translation with a Chinese language</p> <p>9 original and the translation certificate</p> <p>10 at the end, and Exhibit 8 is Bates</p> <p>11 stamped LDP003912 through 22, it's an</p> <p>12 English translation with a Chinese</p> <p>13 language original and the translation</p> <p>14 certificate.</p> <p>15 Q. Ms. Defait, have you ever seen</p> <p>16 either of these two documents before?</p> <p>17 (Witness reviewing document.)</p> <p>18 A. Yes, I think I've seen it before.</p> <p>19 Q. Which one or both of them?</p> <p>20 A. They're almost identical and I</p> <p>21 think I've seen them once before in the</p> <p>22 preparation of this deposition.</p> <p>23 Q. And what are they?</p> <p>24 A. They're documents concerning the</p> <p>25 production, inspection of LP Wujiang and</p>	<p>1 Defait</p> <p>2 these documents?</p> <p>3 A. No.</p> <p>4 Q. Do you know if anyone at</p> <p>5 Chargeurs Entoilage played a role in</p> <p>6 preparing or approving any of these documents?</p> <p>7 A. I don't know.</p> <p>8 Q. Do you know if anyone at</p> <p>9 Chargeurs, S.A. played a role in preparing</p> <p>10 or approving any of these documents?</p> <p>11 A. No, that is not the case.</p> <p>12 Q. So you do know that no one at</p> <p>13 Chargeurs, S.A. played a role in appearing</p> <p>14 or approving this?</p> <p>15 A. That's right.</p> <p>16 Q. And why is that?</p> <p>17 A. Because on the one hand,</p> <p>18 Chargeurs, it is not the role of Chargeurs,</p> <p>19 S.A. to inspect these companies, to inspect</p> <p>20 LP Wujiang, and, secondly, because I asked</p> <p>21 Joelle Fabre-Hoffmeister yesterday if</p> <p>22 Chargeurs, S.A. had ever intervened in the --</p> <p>23 specifically in matters related to inspections,</p> <p>24 if -- of LPW, of LP Wujiang.</p> <p>25 Q. Do you know how these documents</p>



Page 150	Page 152
<p>1 Defait</p> <p>2 are obtained from Wujiang if in fact they were?</p> <p>3 A. No, I don't know.</p> <p>4 Q. You can put those aside for now.</p> <p>5 MS. MORGAN: All of them?</p> <p>6 MR. D'ANGELO: Yes.</p> <p>7 Let's mark the next exhibit</p> <p>8 which I believe is 9.</p> <p>9 (Chargeurs Exhibit 9, printout</p> <p>10 from Chargeurs Fashion Technology</p> <p>11 website in English and French, marked</p> <p>12 for identification, as of this date.)</p> <p>13 Q. I'll represent to you,</p> <p>14 Ms. Defait, that this is a website that was</p> <p>15 printed from the URL indicated at the bottom</p> <p>16 of the page from the chargeurs.fr website</p> <p>17 and I will note for the record that the</p> <p>18 exhibit includes both the English and the</p> <p>19 French versions of the website available</p> <p>20 from Chargeurs' website.</p> <p>21 Do you recognize this, Ms. Defait?</p> <p>22 A. Yes, I do.</p> <p>23 Q. If I can direct your attention</p> <p>24 to the penultimate paragraph on the first</p> <p>25 page. It starts with the sentence Chargeurs</p>	<p>1 Defait</p> <p>2 English by the interpreter.</p> <p>3 MR. D'ANGELO: We can have the</p> <p>4 interpreter translate.</p> <p>5 MS. MORGAN: Yes. Can you</p> <p>6 explain it?</p> <p>7 (Interpreter translates.)</p> <p>8 MR. D'ANGELO: And for the</p> <p>9 record, when I say let's work off of</p> <p>10 the English translation, I mean the</p> <p>11 English version of the website actually.</p> <p>12 MS. MORGAN: And, Eric, the</p> <p>13 question was actually only from the</p> <p>14 first sentence.</p> <p>15 THE INTERPRETER: Okay.</p> <p>16 MR. D'ANGELO: Yes. Just the</p> <p>17 words Chargeurs Fashion Technologies</p> <p>18 through designed interlining, just the</p> <p>19 first sentence, and also that penultimate</p> <p>20 paragraph on the first page.</p> <p>21 MS. MORGAN: Or I don't know if</p> <p>22 the witness was asking for the whole</p> <p>23 paragraph, but maybe if you could</p> <p>24 restate the question, that would be</p> <p>25 clearer.</p>
Page 151	Page 153
<p>1 Defait</p> <p>2 Fashion Technologies provides end-to-end</p> <p>3 solutions for the world's leading menswear</p> <p>4 and womenswear brands by designing interlining.</p> <p>5 Do you see that statement?</p> <p>6 A. I see it.</p> <p>7 Q. Is that statement true?</p> <p>8 A. May I have a translation?</p> <p>9 Q. If it's easier, Ms. Defait, you</p> <p>10 can look at the translation itself which is</p> <p>11 indicated on page 3.</p> <p>12 MR. D'ANGELO: And if the</p> <p>13 translator can direct the witness to</p> <p>14 the same sentence in French on that</p> <p>15 page 3, that would be helpful.</p> <p>16 THE INTERPRETER: So it's</p> <p>17 actually -- it's not a --</p> <p>18 MR. D'ANGELO: Not a direct</p> <p>19 translation?</p> <p>20 THE INTERPRETER: No.</p> <p>21 MR. D'ANGELO: Okay. Well,</p> <p>22 let's just work off of the English</p> <p>23 translation.</p> <p>24 MS. MORGAN: If we're doing that,</p> <p>25 then she would need the translation in</p>	<p>1 Defait</p> <p>2 MR. D'ANGELO: Yes. Let's start</p> <p>3 from the top. And I want the witness</p> <p>4 to only look at the first page and the</p> <p>5 translator to only translate what I'm</p> <p>6 asking. Let's do that.</p> <p>7 (Interpreter translates.)</p> <p>8 THE INTERPRETER: Okay.</p> <p>9 Q. Do you see that sentence,</p> <p>10 Ms. Defait?</p> <p>11 A. Yes.</p> <p>12 Q. Is that sentence true, to the</p> <p>13 best of your knowledge?</p> <p>14 (Witness reviewing document.)</p> <p>15 A. This sentence is from a section</p> <p>16 of the workshop, chargeurs.fr, regarding</p> <p>17 Chargeurs Fashion Technologies, but I don't</p> <p>18 know who drafted this paragraph.</p> <p>19 Q. Are you able to say whether</p> <p>20 Chargeurs Fashion Technologies in fact does</p> <p>21 the things that the sentence says it does?</p> <p>22 (Witness reviewing document.)</p> <p>23 A. It's a very long sentence. I</p> <p>24 don't have any means to say what -- if it is</p> <p>25 an affirmation which is true or not. It is --</p>

Page 154	Page 156
<p>1                   Defait</p> <p>2   it's true on the site of chargeurs.fr,</p> <p>3   so it's information from the different</p> <p>4   divisions, and, therefore, it should be</p> <p>5   true. However, it's a very general statement</p> <p>6   and I'm not all together clear what it's</p> <p>7   intended for.</p> <p>8       Q.   Does Chargeurs, S.A.'s legal</p> <p>9   personnel or Chargeurs Entoilage's legal</p> <p>10   personnel review language that goes up on</p> <p>11   the Chargeurs website before it goes up there?</p> <p>12       A.   Chargeurs, S.A. doesn't have any</p> <p>13   legal personnel, but Chargeurs Boissy does,</p> <p>14   I am in charge of legal affairs at Chargeurs</p> <p>15   Boissy, and Chargeurs Boissy does provide</p> <p>16   legal services to Chargeurs, S.A., and in</p> <p>17   that capacity I sometimes check on information</p> <p>18   related to language that is supposed to be</p> <p>19   regulated, the nature is to be regulated,</p> <p>20   but because the sentence doesn't have any</p> <p>21   information of a legal nature, it wouldn't</p> <p>22   be the case, it just has information about</p> <p>23   the activities, the operations.</p> <p>24       Q.   So you and your team wouldn't</p> <p>25   have reviewed this before it going on the</p>	<p>1                   Defait</p> <p>2       A.   What I understand from the</p> <p>3   sentence is that it's a definition of</p> <p>4   interlining and I don't have the knowledge --</p> <p>5   I don't know if it's a definition which is</p> <p>6   exact because I don't have the technical</p> <p>7   know-how or knowledge to judge if this</p> <p>8   definition is indeed precise.</p> <p>9       Q.   Do you know if interlining is</p> <p>10   used to help jackets, coats, shirts and</p> <p>11   blouses retain their shape and structure?</p> <p>12       A.   Yes.</p> <p>13       Q.   Yes as in it is, it is used for</p> <p>14   those purposes?</p> <p>15       A.   Yes, but I don't know if it's a</p> <p>16   complete and exhaustive definition of</p> <p>17   interlining.</p> <p>18       Q.   I'm not asking you if it's</p> <p>19   complete and exhaustive. All I'm asking</p> <p>20   you, Ms. Defait, is if interlining is used</p> <p>21   to help jackets, coats, shirts and blouses</p> <p>22   retain their shape and structure. Is it or</p> <p>23   is it not?</p> <p>24       A.   Yes, indeed it's a definition of</p> <p>25   interlining as you have already heard.</p>
Page 155	Page 157
<p>1                   Defait</p> <p>2   website?</p> <p>3       MS. MORGAN: Objection to the</p> <p>4   form as to her team and reviewing. You</p> <p>5   can answer if you understand.</p> <p>6       Q.   Do you understand the question?</p> <p>7       A.   I would like in fact to know</p> <p>8   what you mean by team. Do you mean my team?</p> <p>9       Q.   So neither you nor any other</p> <p>10   legal personnel at Chargeurs Boissy reviewed</p> <p>11   this language before it went up on the</p> <p>12   website; right?</p> <p>13       MS. MORGAN: Objection to the</p> <p>14   form. You can answer.</p> <p>15       A.   There is no other legal personnel</p> <p>16   other than myself or other at Chargeurs,</p> <p>17   S.A. or Chargeurs Boissy, so I have not seen</p> <p>18   this, and I have not seen this document.</p> <p>19       Q.   Second sentence of the</p> <p>20   penultimate paragraph in the page says:</p> <p>21   Interlining is generally used between the</p> <p>22   fabric and the lining to help jackets,</p> <p>23   shirts, coats and blouses to retain their</p> <p>24   shape and structure.</p> <p>25       Is that true?</p>	<p>1                   Defait</p> <p>2       Q.   So that's a yes to my question?</p> <p>3       A.   Yes.</p> <p>4       Q.   If I could turn your attention</p> <p>5   to the second page, please.</p> <p>6       It says: In addition to its</p> <p>7   excellent innovation, capabilities and rapid</p> <p>8   response to new fashion trends, Chargeurs</p> <p>9   Fashion Technologies complies and in some</p> <p>10   instances is the only equipment to comply</p> <p>11   with the highest market standards.</p> <p>12       Do you see that?</p> <p>13       A.   Yes.</p> <p>14       Q.   Does in fact Chargeurs Fashion</p> <p>15   Technologies plant equipment comply with the</p> <p>16   highest market standards?</p> <p>17       (Witness reviewing document.)</p> <p>18       MS. MORGAN: Let the record</p> <p>19   reflect it appears the witness is</p> <p>20   looking at the French of this document.</p> <p>21       MR. D'ANGELO: Yes. Let's just</p> <p>22   have -- let's just focus on the English</p> <p>23   language version and we can have the</p> <p>24   translator translate. I just don't</p> <p>25   want to confuse ourselves if it's two</p>

Page 158	Page 160
<p>1 Defait</p> <p>2 different versions.</p> <p>3 MS. MORGAN: Eric, can you</p> <p>4 translate the sentence that was quoted?</p> <p>5 THE INTERPRETER: Yes.</p> <p>6 (Interpreter translating.)</p> <p>7 MR. D'ANGELO: Do you need to</p> <p>8 look up a word?</p> <p>9 THE INTERPRETER: I just want</p> <p>10 to -- you know, it's this fabricated</p> <p>11 line, it's a marketed line, a</p> <p>12 fabricated line, which I want to be</p> <p>13 somewhat exact.</p> <p>14 MR. D'ANGELO: I appreciate it.</p> <p>15 (Interpreter translating.)</p> <p>16 Q. If you know.</p> <p>17 A. I don't know.</p> <p>18 Q. The last full paragraph on that</p> <p>19 page under operations specifications, do you</p> <p>20 see that? The last sentence, it references</p> <p>21 a Chargeurs Fashion Technologies showroom</p> <p>22 that opened in 2017 in New York.</p> <p>23 Do you see that?</p> <p>24 And if you need to have the</p> <p>25 translator translate that sentence, we can</p>	<p>1 Defait</p> <p>2 then we'll finish up.</p> <p>3 MS. MORGAN: Five minutes?</p> <p>4 MR. D'ANGELO: Yes. It will be</p> <p>5 five minutes or less.</p> <p>6 (Whereupon, a brief recess was</p> <p>7 taken.)</p> <p>8 MR. D'ANGELO: Next exhibit,</p> <p>9 Chargeurs 10. These should be stapled</p> <p>10 together, but they're not. Let's make</p> <p>11 them --</p> <p>12 MS. MORGAN: Is there a stapler</p> <p>13 here?</p> <p>14 MR. D'ANGELO: Oh, no, they're</p> <p>15 good.</p> <p>16 (Chargeurs Exhibit 10, website</p> <p>17 printout in English and French, marked</p> <p>18 for identification, as of this date.)</p> <p>19 Q. For the record, Exhibit 10 is a</p> <p>20 printout from the website</p> <p>21 www.chargeurs-fashion-technologies.com/</p> <p>22 products. It's a printout of the English</p> <p>23 language version of the website as well as</p> <p>24 the French language version of the same</p> <p>25 website.</p>
Page 159	Page 161
<p>1 Defait</p> <p>2 do so.</p> <p>3 THE INTERPRETER: Should I</p> <p>4 translate the whole sentence?</p> <p>5 MR. D'ANGELO: Sure. Why don't</p> <p>6 you go ahead and translate it.</p> <p>7 (Interpreter translating.)</p> <p>8 A. No.</p> <p>9 Q. Do you know when that showroom</p> <p>10 was opened?</p> <p>11 A. No, I don't know the exact date.</p> <p>12 Q. Do you know why a showroom was</p> <p>13 opened?</p> <p>14 A. No, I don't.</p> <p>15 Q. Do you know what goes on at the</p> <p>16 showroom?</p> <p>17 A. No.</p> <p>18 Q. Did Chargeurs, S.A. participate</p> <p>19 in the decision to open up that showroom in</p> <p>20 New York?</p> <p>21 A. I don't know.</p> <p>22 Q. You could put that aside,</p> <p>23 Ms. Defait.</p> <p>24 MR. D'ANGELO: Let's just do the</p> <p>25 next one, it will be pretty brief, and</p>	<p>1 Defait</p> <p>2 MS. MORGAN: Frank, is 5</p> <p>3 intentionally blank essentially?</p> <p>4 MR. D'ANGELO: It's essentially</p> <p>5 blank. That was just the way the</p> <p>6 printout ended.</p> <p>7 MS. MORGAN: Okay.</p> <p>8 MR. D'ANGELO: If your question</p> <p>9 is if anything was redacted, the answer</p> <p>10 is no.</p> <p>11 Q. The first page of the document,</p> <p>12 Ms. Defait, it says Interlining For Menswear.</p> <p>13 Do you see that?</p> <p>14 A. Yes.</p> <p>15 Q. And it says: Chargeurs Fashion</p> <p>16 Technologies is one of the world leaders in</p> <p>17 interlinings for the menswear garment industry.</p> <p>18 Do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. And feel free to look at the</p> <p>21 French translation. I think this one is</p> <p>22 actually pretty accurate.</p> <p>23 Do you see that statement,</p> <p>24 Ms. Defait?</p> <p>25 A. Yes, I see that.</p>

41 (Pages 158 to 161)

Defait

Q. In the following sentence, it says: We propose an extensive range of products in every application used in the menswear industry.

Do you see that?

A. Yes, I do.

MS. MORGAN: I request that the translator continue to translate this English because I think there is some difference.

MR. D'ANGELO: All right. Fair enough. We'll stick with the English version.

Q. Ms. Defait, could you flip back to the English version, please?

All right. So let's start with the first sentence and if the translator can translate, please.

(Interpreter translating.)

Q. Let's just break that up piece by piece. The first sentence says: Chargeurs Fashion Technologies is one of the world's leaders in interlining for the menswear garment industry.

## ACKNOWLEDGEMENT

I, VANESSA DEFAIT, hereby certify that I have read the transcript of my testimony taken under oath in my deposition of June 18, 2018; that the transcript is a true, complete and correct record of what was asked, answered and said during this deposition, and that the answers on the record as given by me are true and correct.

\_\_\_\_\_  
VANESSA DEFAIT

Subscribed and sworn to

before me this \_\_\_\_ day

of \_\_\_\_\_, 2018.

\_\_\_\_\_  
NOTARY PUBLIC

Defait

Am I correct that's what the website says?

A. Yes. That's what's indicated on the website, ChargeursFashionTechnologies.com/products.

Q. The second sentence says: We propose an extensive range of products aimed at every application used in the menswear industry.

Do you see that?

A. I see that sentence.

Q. Does Chargeurs Fashion Technologies in fact propose an extensive range of products in every application aimed at the menswear industry?

A. It does say that on the site of the website of CFT, but I don't have either the knowledge or the know-how to comment on its truth, but if it does say there, then it must be that it is true.

MR. D'ANGELO: Let's go off the record, please.

(Time noted: 6:03 p.m.)

## INDEX

WITNESS	EXAMINATION BY	PAGE
Vanessa Defait	Mr. D'Angelo	5

CHARGEURS EXHIBITS	DESCRIPTION	PAGE
Exhibit 1	Amended Notice of Deposition	21
Exhibit 2	Registration Document 2017	49
Exhibit 3	Lainiere de Picardie (Wujiang) Textiles Co., Ltd. Articles bearing production numbers LDP003928-LDP003942 in Chinese and English, plus translation certification	115
Exhibit 4	Chargeurs Interlining 30/04/2014 bearing production numbers LDP000101-LDP000145	139
Exhibit 5	English translation along with the Chinese original and translation certificate bearing production numbers LDP003925-LDP003927	143

## INDEX (C'td.)

CHARGEURS	EXHIBITS	DESCRIPTION	PAGE
	Exhibit 6	English translation	143
		along with the	
		Chinese original	
		and translation	
		certificate bearing	
		production numbers	
		LDP003923-LDP003924	
	Exhibit 7	LPWJ Raw Material	146
		QC Inspection	
		Procedure bearing	
		production numbers	
		LDP003900-LDP003911	
		in English and	
		Chinese and	
		translation	
		certification	
	Exhibit 8	LPWJ Finished	146
		Product QC Inspection	
		Procedure bearing	
		production numbers	
		LDP003912-LDP003922	
		in English and	
		Chinese, and	
		translation	
		certification	
	Exhibit 9	Printout from	150
		Chargeurs Fashion	
		Technology website	
		in English and	
		French	
	Exhibit 10	Website printout in	160
		English and French	

CERTIFICATE  
STATE OF NEW YORK )

) ss.:  
COUNTY OF NASSAU )

I, ROBIN LaFEMINA, a Registered  
Professional Reporter, Certified LiveNote  
Reporter and Notary Public within and for  
the State of New York, do hereby certify:

That VANNESA DEFAIT, the witness  
whose deposition is hereinbefore set forth,  
was duly sworn by me and that such deposition  
is a true record of the testimony given by  
such witness.

I further certify that I am not  
related to any of the parties to this action  
by blood or marriage; and that I am in no  
way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have  
hereunto set my hand this day of ,  
2018.

ROBIN LaFEMINA

## ERRATA SHEET

CASE NAME: HICKEY FREEMAN v. CHARGEURS

DATE OF DEPOSITION: 6/18/18

WITNESS' NAME: VANESSA DEFAIT REF: 21843

PAGE/LINE(S)/ CHANGE REASON

1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			

VANESSA DEFAIT  
SUBSCRIBED AND SWORN TO  
BEFORE ME THIS DAY  
OF , 2018.

NOTARY PUBLIC

MY COMMISSION EXPIRES



<p><b>A</b></p> <p><b>ability</b> 10:6 45:2 72:3,16 73:12 99:15 104:9</p> <p><b>able</b> 137:2 153:19</p> <p><b>access</b> 100:20,23 101:9,23 102:13 102:18,18,20 108:14 111:18,19 127:10 133:25</p> <p><b>accessed</b> 49:16</p> <p><b>account</b> 81:9</p> <p><b>accounting</b> 80:25</p> <p><b>accounts</b> 69:21,23 81:12,13,13,14,20 82:11,12</p> <p><b>accurate</b> 131:24 161:22</p> <p><b>achieve</b> 70:24 71:7</p> <p><b>acquisition</b> 67:20</p> <p><b>acquisitions</b> 91:16 106:18</p> <p><b>act</b> 101:20 106:10</p> <p><b>action</b> 73:9 167:16</p> <p><b>actions</b> 67:20 134:4 137:25</p> <p><b>activities</b> 15:12 66:3,5 68:10,14 68:17,21,24 69:10 106:24,24 154:23</p> <p><b>activity</b> 46:20 47:7 59:9,11 64:10 78:16 89:19</p> <p><b>acts</b> 102:23 129:4 129:11,17 133:2</p> <p><b>actual</b> 109:10 132:10</p> <p><b>added</b> 122:15</p> <p><b>addition</b> 52:12 92:16 157:6</p> <p><b>address</b> 30:16,24</p> <p><b>addressed</b> 47:14</p> <p><b>addresses</b> 111:11</p> <p><b>administrative</b> 50:19</p> <p><b>advice</b> 15:7,11,15 21:8</p>	<p><b>advisor</b> 91:16,17</p> <p><b>advisory</b> 134:12,22</p> <p><b>affairs</b> 15:23 44:13 44:16 154:14</p> <p><b>affirmation</b> 153:25</p> <p><b>ago</b> 12:19 39:10 66:24</p> <p><b>agree</b> 100:8</p> <p><b>ahead</b> 30:7 141:3 146:12 159:6</p> <p><b>ahold</b> 108:24</p> <p><b>aimed</b> 163:8,15</p> <p><b>Alexandre</b> 77:24 77:25</p> <p><b>allegedly</b> 39:14 41:3 43:16</p> <p><b>allotted</b> 8:20</p> <p><b>allow</b> 136:11</p> <p><b>ambiguous</b> 16:24 56:7</p> <p><b>Amended</b> 21:12 165:8</p> <p><b>AMF</b> 50:5,13 51:11 51:14 52:15 131:18</p> <p><b>AMF's</b> 50:7</p> <p><b>amount</b> 43:8</p> <p><b>Angela</b> 28:2 73:23 74:7 88:15 89:4 90:5,7 92:10 93:7 96:24 97:17 98:10 101:11,13 102:17 104:3 106:2 108:2 108:15 111:24,25 112:9</p> <p><b>annual</b> 52:7</p> <p><b>answer</b> 7:10,13 8:8 8:10 14:9 16:24 18:8 20:5,9,20 21:4,7 25:25 26:22 29:17 32:14 34:18 36:4 44:6 45:13 55:24 61:14 64:21 70:7,19 73:5 77:22 78:25 82:6 84:10 87:17 87:20 88:8,11,13</p>	<p>88:14 90:3 91:3,7 99:22 100:18 101:16 102:4 104:15 108:18 109:8 110:23 111:22 125:5 127:8,19 128:4 130:11 141:13 155:5,14 161:9</p> <p><b>answered</b> 30:5,6 33:19 141:12 164:10</p> <p><b>answering</b> 9:25</p> <p><b>answers</b> 7:3 51:17 164:11</p> <p><b>anti-corruption</b> 76:13</p> <p><b>anybody</b> 18:9 28:11</p> <p><b>anyway</b> 102:20</p> <p><b>Apart</b> 124:11</p> <p><b>apologize</b> 88:6</p> <p><b>appearing</b> 149:13</p> <p><b>appears</b> 157:19</p> <p><b>application</b> 162:4 163:9,15</p> <p><b>apply</b> 71:6 145:17 148:15,19</p> <p><b>appointment</b> 71:9 106:22,25 107:2</p> <p><b>appreciate</b> 158:14</p> <p><b>approval</b> 106:17</p> <p><b>approving</b> 148:25 149:6,10,14</p> <p><b>approximately</b> 11:5,14 15:18,20 16:7,11 23:9 34:19,24 43:9 46:11</p> <p><b>area</b> 137:13</p> <p><b>areas</b> 136:23,25 137:17,23 138:2</p> <p><b>Article</b> 50:7</p> <p><b>Articles</b> 115:9 116:3 165:13</p> <p><b>ascertain</b> 84:12 119:2</p>	<p><b>aside</b> 143:8 150:4 159:22</p> <p><b>asked</b> 8:16 12:24 30:4,6 33:4,7 37:11 52:16 61:15 133:3 141:12 149:20 164:9</p> <p><b>asking</b> 6:3 7:11,12 10:3 56:24 80:18 92:9 109:2 152:22 153:6 156:18,19</p> <p><b>aspect</b> 89:22</p> <p><b>Assessment</b> 63:20</p> <p><b>assigned</b> 73:11</p> <p><b>assistance</b> 15:7,11 134:23</p> <p><b>associated</b> 17:13</p> <p><b>assume</b> 7:25</p> <p><b>attached</b> 122:9,15</p> <p><b>attachments</b> 122:11</p> <p><b>attend</b> 34:25 36:18 67:7 75:13 139:8</p> <p><b>attending</b> 137:2</p> <p><b>attention</b> 55:11 128:12 129:24 150:23 157:4</p> <p><b>attorney</b> 8:4,17 18:3 20:17 21:9</p> <p><b>attorneys</b> 8:20 16:12 43:6 126:21 127:3</p> <p><b>attorney-client</b> 20:6 25:10</p> <p><b>auditors</b> 106:20</p> <p><b>Audree</b> 90:21 91:11 93:8 94:8</p> <p><b>authority</b> 50:5,16 50:21,23 51:5</p> <p><b>available</b> 8:22,24 51:3 150:19</p> <p><b>Avenue</b> 2:10 3:7,16 30:17,23 57:24</p> <p><b>aviation</b> 59:4</p> <p><b>aware</b> 9:23 24:6 29:21,25 43:20,22 43:24 51:2 109:13</p>	<p>124:18</p> <p><b>axes</b> 131:7</p> <p><b>a.m</b> 2:5</p> <p><b>B</b></p> <p><b>B</b> 116:16,23,24</p> <p><b>back</b> 25:21 39:9 74:18 78:9 88:3 92:4 117:20 119:4 128:6 162:15</p> <p><b>Baliscut</b> 90:22 91:13</p> <p><b>based</b> 58:8</p> <p><b>basics</b> 6:14</p> <p><b>basis</b> 89:16 107:12</p> <p><b>Bates</b> 115:14 144:9 144:12 147:10</p> <p><b>BC</b> 1:10 3:13 4:5 24:18 25:3 43:21</p> <p><b>bearing</b> 115:9 139:20 143:14,20 146:16,23 165:13 165:18,23 166:7 166:10,15</p> <p><b>beginning</b> 33:25 48:8 64:2 107:20</p> <p><b>begins</b> 51:24</p> <p><b>behalf</b> 12:24 19:22 29:22 44:7 60:5 101:20 105:24</p> <p><b>believe</b> 26:10 32:7 61:8 84:7 92:15 150:8</p> <p><b>belonging</b> 99:18 102:25 108:14 123:22</p> <p><b>Bernard</b> 27:24 65:10,25 68:4 77:14</p> <p><b>best</b> 7:19 16:3 45:2 83:8 125:23 153:13</p> <p><b>better</b> 20:24</p> <p><b>binding</b> 22:4</p> <p><b>blank</b> 161:3,5</p> <p><b>blood</b> 167:17</p> <p><b>blouses</b> 155:23</p>
---	--	---	--	--



156:11,21 <b>board</b> 34:5,6,9,12 34:13,20,23 35:6 35:13,17,23,25 37:13,17,23 48:20 48:22 52:6 62:10 62:16,17,20,22,23 63:3,21 64:8,17 65:14,22 66:2,7,7 66:10,15,18 67:15 67:23 68:2,8,12 68:16,20 69:5,10 69:25 70:15,16 71:11 72:2,8,15 72:19,23 73:8 74:10,11,12 78:14 78:21 89:24 94:11 96:18 104:24 105:2,6,15,21 106:3,12,17 107:11,16,23 <b>bodies</b> 50:22,24 <b>body</b> 50:14,20 51:3 94:25 95:3,7 <b>Boissy</b> 13:11,15,17 14:16,21,24 15:19 15:25 16:2 17:19 17:24 18:11,21 19:2 30:21 44:4,7 58:6,21 70:11 74:16 75:9 87:7 105:4,13,18 124:15,20 125:12 125:16,20 126:8 126:24 154:13,15 154:15 155:10,17 <b>Bolleford</b> 93:11 97:4 <b>born</b> 10:11 <b>boss</b> 18:12 20:2 23:11 <b>Boston</b> 41:18 42:2 42:5,8 79:9,10 <b>bottom</b> 49:24 116:21 117:22 118:8 119:5 150:15	<b>Boulevard</b> 4:16 <b>boxes</b> 60:19 <b>brands</b> 151:4 <b>break</b> 8:14 32:22 33:3 66:22,23 121:16 144:3,5 162:21 <b>breaks</b> 8:13 <b>brief</b> 32:24 53:10 67:4 144:6 159:25 160:6 <b>broad</b> 85:17 98:3 131:6,7,7 132:7 134:22 135:2 <b>broke</b> 92:8 <b>brought</b> 76:5 <b>budget</b> 67:22 <b>budgets</b> 68:7 <b>bullet</b> 129:25 133:14 <b>Buquen</b> 93:9,24 105:12 119:17 <b>business</b> 11:8,10 15:14 20:16 41:12 54:4,8,15 55:3 56:12,16 62:4 64:8,24 65:2 75:24 78:14 89:15 89:17,18,21,22 91:12,13 99:19 104:17 130:9,17 130:24 131:3,5,11 <b>businessperson</b> 20:23 <b>bylaw</b> 100:7 <b>bylaws</b> 74:8 106:21 107:7 117:10 <b>B-O-I-S-S-Y</b> 13:17 <b>B-O-L-L-E-F-O-...</b> 93:23 <b>B-O-S-T-O-N</b> 41:20 <b>B-U-Q-U-E-N</b> 93:24 <hr/> <b>C</b> <hr/> <b>C</b> 3:2 4:2 164:2	167:2,2 <b>call</b> 23:3,6,11 28:8 70:12 84:15 <b>called</b> 5:3,9 39:6 42:25 47:25 60:6 107:13 113:22 114:10 <b>calls</b> 9:9 20:19 22:25 29:15 32:11 70:8 73:4 88:9 109:7 <b>Canada</b> 114:8 <b>Canele</b> 40:8,10,16 <b>canvas</b> 39:25 <b>capabilities</b> 157:7 <b>capacity</b> 154:17 <b>capital</b> 60:4 116:22 <b>Caroline</b> 3:15 22:11,23 56:6 <b>case</b> 1:8 29:2,9 42:9 42:14,23 43:5,11 47:9 73:6 84:5,13 96:25 97:16 101:18 109:22 124:22 149:11 154:22 168:3 <b>catch</b> 9:2 96:16 <b>Cecelia</b> 63:17 <b>cells</b> 136:24 <b>central</b> 130:2 133:15 <b>CEO</b> 71:5 89:6 95:25 96:21 <b>certain</b> 9:11 22:12 24:6 51:15 70:25 71:2,2,7,18 105:5 105:7 106:19 108:14 109:14,20 109:25 111:10,11 123:22 129:13 135:17 <b>certainly</b> 127:11 138:25 <b>certificate</b> 143:13 143:19 144:12,15 147:9,14 165:23 166:7	<b>certification</b> 115:12,19 146:18 146:25 165:16 166:13,18 <b>Certified</b> 2:12 167:7 <b>certify</b> 164:5 167:9 167:15 <b>CFT</b> 70:13,16 71:13 72:7,14,17 72:20 73:10,13,14 73:17,25 75:12 80:8 81:16 84:8 85:3,5,6,6,9,16 86:7,12,21 88:16 89:15,17,18,22 96:23,25 98:7,23 102:25 124:24 125:7,14 134:15 135:10,14 138:21 139:7 141:8 142:15 163:18 <b>Chan</b> 28:2,22 73:23 74:7 88:15 89:4 90:5,7,16 92:10 92:17 93:7 96:24 97:17 98:10 101:11,13,24 102:17 106:2 108:2 109:2 111:24,25 112:9 <b>chance</b> 21:16 144:18 <b>change</b> 33:9,11 48:6,9,14 57:16 70:5 100:7 108:16 168:5 <b>changed</b> 48:13 131:21 141:8 <b>changer</b> 67:22 138:2 <b>changes</b> 53:5 106:21 <b>changing</b> 102:20 106:20 <b>channels</b> 114:11,13 114:15	<b>Chan's</b> 107:3 108:15 <b>charge</b> 154:14 <b>Chargetex</b> 58:18 58:19,19 59:6 <b>Chargeurs</b> 1:9 2:8 3:12 4:4 13:4,7,11 13:15 14:16,21,24 14:25 15:2,5,19 15:25 16:2,5,13 16:16,21,23 17:3 17:5,7,12,18,19 17:24 18:3,5,11 18:21,24 19:2,8 19:12,18,22 21:2 21:11,12,21 22:4 22:13,15 29:19,22 30:14,18,21 31:4 31:7 32:5,20 33:4 33:5 34:4 36:3,5,7 36:11,14,25 37:24 38:8,14,18 40:24 41:2,22 43:15 44:7,9,14,20 45:23 46:12,14,15 47:2,3,4,8,9,12,20 47:21,23,25 48:3 48:19 49:2,3,14 53:20 54:11,20,21 54:22,24 55:2,3 55:21 56:4,17 58:2,6,12,17,17 58:20,21,22,25 59:3,18,22,23 60:20,22,25 61:4 61:6,9,15,17,18 61:21 62:3,6,18 62:24 63:3 64:12 64:17,18,25 65:6 65:8,14,22 66:4,8 67:10,24 68:14 69:7,11,14,16,18 69:22,25 70:2,11 70:12,15,20,21 71:3,4,5,6,11,24 72:3,4,7,9,15,24 73:9,18,21 74:8
--	---	---	--	---

74:13,15,15 75:8 75:9,11 78:4,18 78:21 79:20 81:11 85:10,15,20,21,22 85:23,24 86:5,11 86:20,23,25 87:6 87:7,9,13 88:20 88:23,24 89:6 90:17 92:11 94:2 94:12 95:6,8,10 95:19,22,25 96:20 96:22 97:3,5,7,14 97:20,21,23 98:19 98:21 99:10,11,12 99:14,15,19,20,24 99:25 100:11,16 100:19,20,22,23 101:9,19,21,22,23 101:24 102:2,7,13 102:19,21 104:5,8 104:20 105:3,4,11 105:13,17 107:23 108:5,9,11,13,24 109:4,11,20,23 110:12 111:9,12 111:14,17,18 112:3,8,12,14,19 112:23 115:7 118:19 121:24 122:5,12,20 123:6 123:7,10,12,18,22 124:2,5,7,13,15 124:15,19,20,23 124:25 125:8,10 125:12,12,16,16 125:20,20 126:2,7 126:7,8,13,20,21 126:24 127:3,10 127:21 128:14,20 128:24 129:4,9,14 129:15,22 130:8 131:11,14 132:6,9 132:16,20,25 133:5,11,22,24 134:2,7,10,13,14 134:15 135:7,8,18 135:20,24 136:8	136:16,18,22 137:5,9 138:4 139:19,19 141:6 142:10,11,13,18 143:11,17 146:14 146:21 149:5,9,13 149:18,18,22 150:9,10,20,25 152:17 153:17,20 154:8,9,11,12,13 154:14,15,16 155:10,16,17 157:8,14 158:21 159:18 160:9,16 161:15 162:23 163:13 165:7,17 166:4,20 168:3 <b>ChargeursFashi...</b> 163:5 <b>chargeurs.fr</b> 150:16 153:16 154:2 <b>chart</b> 118:18 <b>check</b> 92:22 115:25 154:17 <b>checking</b> 32:17,17 <b>checks</b> 134:6 <b>chief</b> 97:2 <b>China</b> 117:6 141:18 <b>Chinese</b> 115:10,16 115:17 117:15,16 143:12,18 144:11 144:14 146:18,25 147:8,12 165:15 165:22 166:6,12 166:17 <b>Chuck</b> 28:16 77:23 <b>Civ</b> 1:8 <b>civil</b> 9:20 <b>clarification</b> 106:11 <b>clear</b> 13:14 37:21 105:15 125:13 154:6 <b>clearer</b> 7:14 14:14 152:25	<b>client</b> 42:25 <b>CLOTHING</b> 1:5 <b>Cloud</b> 58:17,22,25 59:3 <b>cmorgan@foxrot...</b> 3:19 <b>coaching</b> 26:25 <b>coats</b> 155:23 156:10,21 <b>code</b> 39:16,18 76:11 <b>colon</b> 130:3 133:16 <b>colors</b> 54:8 <b>Columbus</b> 46:7,9 63:7,9,10,12 <b>column</b> 55:12 63:20 82:17 <b>come</b> 87:14 <b>comment</b> 14:9 163:19 <b>commercial</b> 59:2 130:13 <b>COMMISSION</b> 168:24 <b>commitments</b> 105:23 <b>committee</b> 36:6,11 36:13,22 37:4 48:21,22 90:9,13 92:18 93:3,5 94:19,21,24,24 95:5,5,6,12,25 96:6,10 <b>committees</b> 62:10 62:16,21 <b>common</b> 124:16 <b>communication</b> 20:7 <b>communications</b> 29:16 <b>companies</b> 15:16 17:13 43:14 47:5 47:19 51:6 58:8 59:7,8,12,13,14 79:14,17,24 80:4 80:10,12,13 81:6 81:24 82:2 83:19	83:21,23,24 84:7 95:22 99:5 102:25 103:6,16 114:20 122:5,20 123:6,8 123:14 124:12,17 129:5,12,13,14,18 129:21 133:3,4,8 133:9,10 136:12 136:15,20 137:7 139:2 149:19 <b>company</b> 13:9,12 13:13,20,21 14:22 15:13 20:25 34:15 38:17,23 41:2,21 41:23 44:2,3 45:24 46:15,17,18 47:21 59:19,20,23 60:6,6,10,21 61:2 61:9,18 62:5 79:20 85:19 86:2 86:24 87:11 88:25 97:9 98:7,22 102:24 103:3,4,7 103:12 105:24 106:21,23 107:5,6 107:7 113:11 114:23,25 115:3 116:24,25 117:11 117:16 121:3,8 124:22,22 128:21 128:24 129:4,5,12 129:17 133:2,2 137:24 142:19 <b>company's</b> 106:24 <b>Complaint</b> 29:5 31:10,11,20,22 32:4,20 33:6 <b>complete</b> 156:16,19 164:8 <b>completely</b> 27:3 121:13 <b>complex</b> 118:24 <b>complies</b> 157:9 <b>comply</b> 157:10,15 <b>composed</b> 74:14 <b>compound</b> 78:25 90:3	<b>comprise</b> 95:18,21 125:14 129:21 <b>comprises</b> 96:2 <b>comprising</b> 137:16 <b>concept</b> 81:4 <b>concern</b> 112:8,19 145:9 <b>concerning</b> 24:23 56:9 66:2 147:24 148:2 <b>concisely</b> 131:9 <b>conclusion</b> 32:11 109:8 <b>conditions</b> 10:4 <b>conduct</b> 11:8 <b>conducted</b> 136:15 <b>confuse</b> 157:25 <b>Connecticut</b> 4:17 <b>connection</b> 31:5 40:19 43:5,16 104:19 121:23 126:4,9 <b>conseil</b> 34:12 <b>consider</b> 30:12 <b>considered</b> 19:24 83:13 <b>consistency</b> 140:12 140:20 <b>consistent</b> 138:6,11 138:15 <b>consists</b> 115:17 <b>consolidated</b> 69:23 79:14,17,24 80:11 80:12,15,18 81:6 81:9,12,13,18,20 82:2,3,8,10,12 83:3,17,23 <b>consolidation</b> 82:17 <b>constituted</b> 38:25 <b>consultant</b> 100:4 <b>consulting</b> 134:11 <b>contents</b> 51:22 119:13 <b>context</b> 46:20 54:23 57:12 61:5 69:7 80:15 83:16
--	--	---	---	---

85:7 89:24 95:10 98:5 126:23,25 127:12 141:9 142:5 <b>continue</b> 162:9 <b>CONTINUED</b> 33:2 67:6 92:3 121:18 <b>contract</b> 98:12 <b>contrast</b> 103:6 108:10 <b>contributed</b> 116:22 <b>control</b> 55:8,13 83:3,18 132:16,19 132:24 133:17,19 133:21 134:3 145:10 <b>conversation</b> 23:21 23:25 27:10 119:15 <b>conversations</b> 11:11 12:13 23:18 24:23 27:11,12 87:18 111:5,8 119:10,13 <b>copy</b> 33:6 <b>Coquoin</b> 63:18 <b>corner</b> 49:24 <b>corporate</b> 13:18 14:17 19:2,5,18 20:3,24 38:23 43:23 48:13,15,16 51:23 81:12 100:13 <b>correct</b> 9:5,16 21:25 22:5 25:5 37:18 39:3 41:13 47:15,24 48:12 51:25 52:8 60:24 62:14,18,24 65:11 66:12 72:5 76:6 80:4,8 85:22 86:5 86:8 88:17 89:7 92:6 110:9 118:9 121:11,13,20 122:13 123:19,23 124:3,8 125:17 128:25 129:9,19	138:18 139:5 145:15 163:2 164:9,13 <b>corrected</b> 52:22 <b>correction</b> 53:6 <b>corrections</b> 53:2 <b>correctly</b> 12:18 35:12 39:17 40:23 107:6 <b>counsel</b> 16:13 22:18 23:16 24:20 26:25 31:5,5,21 33:5,8 87:18 88:10 110:25 <b>counsel's</b> 27:4 <b>COUNTY</b> 167:5 <b>course</b> 8:6 127:5 146:8 <b>court</b> 1:2 6:16 29:9 31:12,25 102:9,14 102:16 <b>covered</b> 67:17 <b>created</b> 59:21 62:5 62:14 107:16,18 <b>criminal</b> 9:20 <b>currency</b> 43:9 <b>currently</b> 10:13 13:3,6 63:2 <b>C'td</b> 4:2 166:2 <b>C-A-N-E-L-E</b> 40:11 <b>C-H-A-R-G-E-T...</b> 58:20 <b>C-H-A-R-G-E-U...</b> 13:16 <b>C-L-O-U-D</b> 58:24 <b>C-O-L-O-M-B-U...</b> 63:10  <b>D</b> <b>D</b> 3:6 164:2 165:2 166:2 <b>daily</b> 132:20,21 <b>data</b> 67:19 <b>date</b> 21:14 32:19 33:14,21 48:9 49:5 83:3 107:21	115:13 139:23 143:16,22 145:22 145:23 146:3,20 147:3 150:12 159:11 160:18 168:3 <b>dates</b> 145:20 <b>day</b> 8:6,14,23,25 11:17,19 164:19 167:20 168:21 <b>days</b> 8:21 11:14 <b>day-to-day</b> 87:8 142:20 <b>de</b> 1:9,10,11 3:12 3:13 4:4,5 28:5 43:21,23 47:12 115:8 116:2 121:3 121:8 141:17 165:12 <b>dealing</b> 11:21 <b>December</b> 79:16 <b>decided</b> 31:20 <b>decision</b> 101:11 106:3,4 159:19 <b>decisionmaking</b> 100:9 106:2 <b>decisions</b> 100:5,8 100:12 104:24 106:12,14,15 107:14,15,22 <b>declaration</b> 145:22 <b>deconsolidated</b> 83:25 84:3,9 <b>deed</b> 109:10 <b>deem</b> 29:20 <b>deemed</b> 64:13 78:19 <b>Defait</b> 1:17 2:8 5:8 5:18,22 6:1 7:1 8:1 9:1,24 10:1,9 10:18 11:1 12:1 12:12 13:1 14:1 15:1 16:1 17:1 18:1 19:1 20:1 21:1,16 22:1,19 23:1,16 24:1,20 25:1 26:1,7 27:1	28:1 29:1 30:1 31:1 32:1 33:1,3 34:1 35:1 36:1 37:1 38:1,5 39:1 40:1 41:1 42:1 43:1,2 44:1 45:1 46:1 47:1 48:1 49:1,10 50:1,9 51:1 52:1 53:1,12 53:25 54:1 55:1 56:1 57:1 58:1 59:1 60:1 61:1 62:1 63:1 64:1,14 65:1 66:1 67:1 68:1 69:1 70:1 71:1 72:1 73:1 74:1 75:1 76:1 77:1 78:1 79:1 80:1 81:1 82:1 83:1 84:1,14,16 85:1 86:1 87:1 88:1,12 89:1 90:1 91:1 92:1,4 93:1 93:16 94:1 95:1 96:1 97:1 98:1 99:1 100:1 101:1 102:1 103:1 104:1 105:1 106:1 107:1 108:1 109:1 110:1 110:5 111:1 112:1 113:1 114:1 115:1 116:1 117:1,23 118:1 119:1 120:1 121:1,19 122:1 123:1 124:1 125:1 126:1 127:1 128:1 129:1 130:1 131:1 132:1 133:1 134:1 135:1 136:1 137:1 138:1 139:1 140:1 141:1 142:1 143:1 144:1,16 145:1 146:1 147:1,15 148:1 149:1 150:1 150:14,21 151:1,9 152:1 153:1,10 154:1 155:1 156:1	156:20 157:1 158:1 159:1,23 160:1 161:1,12,24 162:1,15 163:1 164:4,16 165:5 167:10 168:4,20 <b>defective</b> 39:13,14 41:4 43:16 <b>Defendants</b> 1:14 3:12 4:4,13 <b>define</b> 136:13 137:24 <b>defined</b> 132:10,13 136:24 <b>defines</b> 132:6 <b>definition</b> 17:5,16 98:4 156:3,5,8,16 156:24 <b>degree</b> 44:22,23 45:4,8,11,14 <b>degrees</b> 44:24 <b>delist</b> 51:5 <b>demand</b> 15:12 <b>denied</b> 102:17 <b>depend</b> 132:24 <b>depends</b> 11:18,20 34:21 56:21 131:13 132:18 138:10 <b>deponent</b> 19:21 <b>deposed</b> 6:10 <b>deposition</b> 1:17 2:7 6:2,6 8:21 12:21 19:9,19,21 21:13 21:22 22:8 23:14 26:7,13 27:2,16 28:12,17,20,23 29:11 87:15 110:9 116:7 145:3 147:22 164:7,11 165:9 167:11,12 168:3 <b>depositions</b> 29:2 <b>Derolez</b> 93:8 97:2 <b>describe</b> 10:21 <b>described</b> 107:15 <b>description</b> 73:15
--	---	---	--	---

165:7 166:4 <b>designate</b> 85:6 <b>designated</b> 21:24 <b>designation</b> 13:18 14:17 38:23 48:23 95:9 <b>designed</b> 152:18 <b>designing</b> 151:4 <b>determined</b> 70:2 71:12 <b>determining</b> 135:13 <b>development</b> 91:14 <b>diagram</b> 118:19,20 118:24 121:13 <b>DICKER</b> 4:14 <b>difference</b> 130:17 131:2 162:11 <b>different</b> 30:7 31:15 32:10 54:8 68:6 137:5 138:13 154:3 158:2 <b>diffuse</b> 95:24 <b>direct</b> 20:9 21:3,7 52:6 55:10 119:9 128:11 129:24 133:6 134:3 150:23 151:13,18 <b>directed</b> 47:16 <b>direction</b> 69:6,17 69:19 70:3 75:23 76:3 <b>directly</b> 16:4,12 106:8,9,13 114:13 127:15 141:22 <b>director</b> 64:18 65:6 65:8 70:23,24 71:12 72:4,14,17 72:20 73:13,14,17 73:25 75:12 88:16 96:25 97:5 98:7 98:16,18 101:19 <b>directors</b> 34:5,7,9 34:12,13,16 35:7 35:24 37:14,17,23 48:20 52:6 62:17	62:22,24 63:21 64:7,17,23 65:14 65:20 66:2,7,10 66:18 67:23 68:2 68:5,9,12,16,20 69:5,10 72:9,19 72:24 73:8 78:13 78:21 94:11,11 98:2 <b>disclose</b> 29:16 119:10 <b>disclosed</b> 69:23 83:12 <b>disclosing</b> 20:6 <b>discuss</b> 12:12 22:19 23:17 26:2 34:16 35:13 137:3 <b>discussed</b> 8:20 22:21 66:14 67:9 67:13,18 75:24 76:22 94:19 104:13,19 135:23 136:4 146:7 <b>discussion</b> 35:24 37:3,12,16,25 61:25 65:25 68:4 75:22 76:5,14 78:5,8 91:22 136:9 <b>discussions</b> 36:23 64:6 65:13,19,21 78:12 88:9 110:25 136:5 <b>dismiss</b> 71:14 72:4 72:16,20 73:10,13 <b>dismissal</b> 71:10,21 <b>dismissed</b> 40:17,20 <b>disrespect</b> 84:25 <b>disseminated</b> 137:22 <b>distracted</b> 41:6 <b>distribution</b> 113:20 <b>distributor</b> 113:16 113:21 114:10 <b>DISTRICT</b> 1:2,3 <b>division</b> 62:4 66:3,5 70:21,23 73:20	74:3 77:10,13 85:19 86:8,10,12 90:8 97:19,20 98:23 102:25 124:23,23,24 125:2,14 134:15 135:14 136:12,13 137:21 138:21 141:8 <b>divisions</b> 41:12 57:11 68:11 75:7 96:3 132:11,11,12 138:12 154:4 <b>document</b> 21:17,19 31:12,15,17 49:4 49:9,13,18,20,23 50:3 51:10,14,16 52:14,17,18 54:16 54:19 56:14 57:13 62:9,14 80:20 82:4 83:10,11,11 83:14 96:4,17 110:14,18 115:14 115:16,20,24,25 116:6,11 117:8,9 117:15,17,19 118:3 128:7,8 131:17,21,24 139:24 140:2,7,9 142:10 143:3 147:17 153:14,22 155:18 157:17,20 161:11 165:10 <b>documentation</b> 100:13 <b>documents</b> 22:12 24:3,7,11,12,23 24:25 25:2,9 26:3 29:8 31:16 99:18 99:24 100:11,14 100:15 101:23,25 102:8,13,18 104:11,12,18,19 104:21,22,23 107:24 108:14,24 109:3,5,14,20,24 109:25 110:13,15	111:19 112:4,7,10 112:15,18,23 121:23 122:6,8 123:22 126:4,10 126:14,18,18,25 127:4,12,15,20,24 144:20,23 145:5,7 145:21 146:3,7 147:5,6,16,24 148:6,25 149:2,6 149:10,25 <b>doing</b> 71:13 151:24 <b>Dong</b> 28:19 <b>draft</b> 51:15 <b>drafted</b> 52:13 143:4 153:18 <b>drafting</b> 51:19 <b>duly</b> 5:4,10 167:12 <b>d'administration</b> 34:12 <b>D'Angelo</b> 3:6 5:15 5:25 13:24 14:12 19:7,13 21:10 25:19,23 26:11,15 26:18,24 32:2,23 33:2,18 38:12 41:8 48:25 49:8 53:8,15,17 55:25 56:5 57:6 66:23 67:3,6 72:25 77:21 80:21,23 86:18 87:19,24 91:5,21 92:3,23 93:14 108:19 111:3 113:3 115:5 118:2 119:12 121:15,18 122:23 123:3,13 125:3 130:19 132:3 138:8 139:17 140:3,22 141:2 143:9 144:2,5 146:12 147:4 150:6 151:12,18 151:21 152:3,8,16 153:2 157:21 158:7,14 159:5,24	160:4,8,14 161:4 161:8 162:12 163:22 165:5 <b>D-E-R-O-L-E-Z</b> 93:22 <hr/> <b>E</b> <b>E</b> 3:2,2 4:2,2 164:2 164:2,2 165:2 166:2 167:2,2 <b>earlier</b> 26:10,14,17 29:2 57:24 60:20 61:4 74:23 83:20 84:14,23 85:3 88:16 96:7 104:13 108:4 121:22 135:22 138:16 <b>easier</b> 23:12 51:22 151:9 <b>EDELMAN</b> 4:14 <b>efforts</b> 110:12 <b>either</b> 15:15 107:19 146:2 147:16 163:18 <b>ELSER</b> 4:14 <b>EMAIL</b> 3:10,19 4:11,19 <b>Emmanuel</b> 63:18 <b>employed</b> 16:12 34:15 94:2 98:8 <b>employee</b> 16:16 87:5,7 88:19 99:9 99:10 103:20,24 109:11 <b>employees</b> 15:19 17:22 122:12 124:2,5 <b>employment</b> 98:11 <b>enacted</b> 106:13 <b>enactment</b> 145:22 <b>encompassed</b> 89:20 <b>encompasses</b> 98:3 131:7 <b>encountered</b> 70:10 <b>ended</b> 161:6 <b>end-to-end</b> 151:2 <b>engage</b> 105:23
--	---	--	--	---

<b>English</b> 10:17,19 10:20,22,23,24,24 10:25,25 11:3,9 11:11,15 12:2 33:19 115:11,18 143:11,17 144:10 144:13 146:17,24 147:7,12 150:11 150:18 151:22 152:2,10,11 157:22 160:17,22 162:10,13,16 165:15,21 166:5 166:12,17,21,23 <b>ensuring</b> 135:16 <b>entire</b> 16:16,21 52:18 <b>entirely</b> 119:2 <b>entities</b> 97:13 122:5 122:20 125:6,7,9 125:14,15 <b>entity</b> 61:2 85:4,13 85:14 95:9 97:9 97:13,25 98:13 125:23 <b>Entoilage</b> 44:14 47:21,23 48:2,4 71:3,4,5,6 73:19 73:22 74:9,13 85:20,21,24 86:5 86:11,20,23 87:2 87:6,9,14 88:20 97:21,22,23 98:19 98:21 99:10,12,16 99:19,20,25 100:21,23 101:19 101:21,23 102:21 104:5,20 105:3 108:5,9 111:18 134:13,14,16 135:7,21 141:7 142:10,11 149:5 <b>Entoilage's</b> 100:16 111:14 154:9 <b>Epinau-Sur-Seine</b> 10:12 <b>equipment</b> 157:10	157:15 <b>equivalents</b> 45:6 <b>Eric</b> 4:15,22 5:2 14:3 86:13 108:19 138:9 152:12 158:3 <b>eric.niederer@w...</b> 4:19 <b>ERRATA</b> 168:2 <b>especially</b> 15:11 <b>ESQ</b> 3:6,15 4:9,15 <b>essentially</b> 161:3,4 <b>establish</b> 69:19 <b>ethics</b> 76:11,12 <b>Eurasia</b> 15:3 47:4 58:12 <b>euros</b> 43:10 <b>events</b> 10:6 <b>eventually</b> 74:17 <b>exact</b> 32:19 43:7 48:9 57:4 107:21 156:6 158:13 159:11 <b>exactly</b> 120:10 123:2 135:6 138:22 <b>EXAMINATION</b> 5:14 165:4 <b>examined</b> 5:12 <b>example</b> 100:6 130:15 <b>examples</b> 130:3 <b>excellent</b> 157:7 <b>exception</b> 8:9 <b>exceptionally</b> 66:19 <b>exchanged</b> 24:7,12 25:2 109:14 <b>excluding</b> 43:6 <b>excuse</b> 10:3 27:13 94:20 102:16 115:23 124:9 <b>executive</b> 36:11 90:9,13 92:18 93:3,4 94:19,20 94:23 95:24 96:6 96:9 97:3 <b>exhaustive</b> 156:16	156:19 <b>exhibit</b> 21:11,12 49:2,3 110:2 115:6,7,14,17 117:20 118:9,21 119:4 128:6,8 139:18,19 140:5 143:11,17 144:9 144:12 146:14,21 147:10 150:7,9,18 160:8,16,19 165:8 165:10,12,17,21 166:5,9,14,19,22 <b>Exhibits</b> 144:8,17 146:13 148:21 165:7 166:4 <b>exist</b> 26:4 <b>expect</b> 6:15 <b>expected</b> 70:24 71:7 <b>expert</b> 81:8,21 <b>EXPIRES</b> 168:24 <b>explain</b> 17:4 82:10 152:6 <b>explained</b> 82:7 <b>extant</b> 117:12,17 <b>extensive</b> 162:3 163:8,14 <b>extent</b> 16:23 20:4 20:20 26:22 29:15 32:10,13 40:20 70:7 73:4 88:8 109:7 110:24 <b>external</b> 31:21 75:21 <b>e-mail</b> 104:18 111:11 123:25 <b>e-mails</b> 11:12 100:15,20 101:10 110:13 111:10,14 121:25 122:9,10 122:12,21 123:5,9 124:6,7,12 <hr/> <b>F</b> <hr/> <b>F</b> 167:2 <b>Fabre</b> 93:6 105:10	<b>Fabre-Hoffmeister</b> 18:12 19:22 22:14 52:24 90:20 91:10 93:17 94:7 119:16 135:4 149:21 <b>fabric</b> 40:2 155:22 <b>fabricated</b> 158:10 158:12 <b>face</b> 22:23,23 <b>facilities</b> 91:4 142:16 <b>fact</b> 52:25 65:13 71:16,17 84:8 109:10,13,19 114:17 150:2 153:20 155:7 157:14 163:14 <b>factories</b> 135:14 <b>fair</b> 8:2 16:19 81:23 162:12 <b>fall</b> 106:19 <b>false</b> 52:21 53:3,4 <b>familiar</b> 85:25 121:2 <b>far</b> 12:2 43:18 77:22 124:14 <b>fashion</b> 54:12 55:2 56:17 59:22 60:21 60:25 61:4,6,18 64:19,25 65:6,8 66:3,4 67:10 68:15 69:16 70:2 70:12,20,21 71:25 72:5 80:6 83:24 85:11 97:14 150:10 151:2 152:17 153:17,20 157:8,9,14 158:21 161:15 162:23 163:13 166:20 <b>fdangelo@loeb.c...</b> 3:10 <b>February</b> 44:17 <b>Federico</b> 93:7,20 <b>fee</b> 134:17 <b>feel</b> 161:20 <b>fees</b> 40:22 43:6	<b>felt</b> 59:17 <b>file</b> 50:22 <b>filed</b> 29:8 31:12,23 40:16 42:23 49:18 49:20 50:4 52:15 131:18 <b>files</b> 100:16 119:18 <b>filing</b> 51:10,13 132:2 <b>fill</b> 17:22 <b>film</b> 42:15 47:3,9 47:10,12 79:11 124:24 125:8 <b>Films</b> 97:4 <b>finance</b> 77:10,16 81:8 <b>financial</b> 15:7,11 50:4,15 69:22 80:24 81:3,7,17 81:22 82:5,9 84:2 90:7 99:19 104:17 133:23 <b>find</b> 126:3,18 127:24 137:10 <b>fine</b> 5:24 7:16 8:12 8:18 12:15 21:18 28:10 <b>finish</b> 160:2 <b>finished</b> 76:24 146:22 166:14 <b>fire</b> 74:4 <b>firing</b> 71:22 <b>firm</b> 16:9 <b>firmly</b> 102:17 <b>first</b> 5:4,9 11:2 12:8 12:16 21:11 23:3 31:7,9 44:25 53:19 74:22 115:22,23,25 117:7 141:4 143:5 143:6 150:24 152:14,19,20 153:4 161:11 162:18,22 <b>fiscal</b> 15:6,10 <b>fit</b> 141:9 <b>Fitexin</b> 14:25 15:9
--	--	---	---	--



86:2,4,7,12,24 87:6,10,14 97:24 97:25 98:20 102:22 103:10,21 103:24 104:5,9,25 105:16,22 106:16 107:9,24 108:6,15 108:16 109:3,5,12 112:4,7,8 114:21 116:13 117:5 121:5,10,14 148:24 <b>five</b> 8:15 63:5 160:3 160:5 <b>flexible</b> 48:17 <b>flip</b> 55:5 162:15 <b>flipping</b> 118:4 <b>Floor</b> 4:7 <b>focus</b> 157:22 <b>follow</b> 21:8 <b>followed</b> 40:11 93:22 97:4 130:2 133:15 135:17 146:8 <b>following</b> 71:2,8,9 162:2 <b>follows</b> 5:7,13 55:16 <b>force</b> 117:12 <b>forecast</b> 67:22 <b>form</b> 16:22 18:7 20:18 32:7 44:6 45:13 55:24 56:2 56:6 64:20 70:7 70:19 72:23 78:25 90:3 99:21 100:18 101:16 102:4 104:15 109:7 111:22 127:7,19 128:3 130:11 155:4,14 <b>forth</b> 167:11 <b>found</b> 42:21 52:20 52:24 <b>four</b> 45:15,22 54:4 54:8,14 56:12 57:11 64:8,24	65:2 75:6,24 78:13 136:22 137:17 138:2,11 148:22 <b>four-year</b> 45:21 <b>Fox</b> 3:14 4:6 12:14 29:16 33:15,17 111:2,5,8 119:11 119:17 127:12,15 127:22,25 <b>framework</b> 119:21 <b>Fran</b> 27:22 <b>France</b> 5:21 10:12 10:14,15 40:5 84:19 <b>Francois</b> 27:15 119:16 <b>Frank</b> 3:6 5:25 91:2 93:12 161:2 <b>free</b> 102:6 161:20 <b>Freeman</b> 1:5 6:2 24:16,17 25:4,10 35:14,25 36:2,23 36:24 37:3,13,25 109:21 120:16 126:11,15,19 127:6 146:10 168:3 <b>Freeman's</b> 110:14 <b>French</b> 4:22 5:3 32:17 47:12 48:24 49:17,18,21 50:3 50:4 57:3 76:12 150:11,19 151:14 157:20 160:17,24 161:21 166:21,23 <b>Fribourg</b> 63:7 89:5 89:13 90:5,16 92:17 93:17 94:15 96:19 <b>Friday</b> 23:2 <b>full</b> 38:22 158:18 <b>fully</b> 79:17,24 80:11,12,14,18 81:6,25 82:3,8 83:2,17,22 <b>function</b> 17:22	18:11 73:16 <b>functional</b> 60:11 <b>functions</b> 130:2 133:15 <b>fund</b> 46:10 <b>further</b> 57:12 82:10 167:15 <b>fusible</b> 38:4,9 39:19 <b>F-A-B-R-E</b> 18:17 <hr/> <b>G</b> <b>G</b> 164:2 <b>gain</b> 102:20 <b>game</b> 67:21 138:2 <b>garment</b> 53:23 161:17 162:25 <b>gather</b> 109:23 112:15,23 126:14 <b>gathered</b> 109:20 <b>general</b> 18:13,19 50:7 52:7 65:16 67:17 69:6 70:3 71:24 72:6,11,12 73:10,20 76:8 77:9,11 80:22 89:18,21 91:10 96:2 97:18 131:6 132:12 154:5 <b>generally</b> 155:21 <b>getting</b> 21:5 74:18 78:9 <b>give</b> 6:20 7:9,13 21:25 26:11 29:22 51:17 58:15 89:14 89:23 90:10 126:18 <b>given</b> 57:4 164:12 167:13 <b>global</b> 53:20 137:10,14,16,19 <b>globally</b> 137:20 <b>globe</b> 138:6 <b>go</b> 6:14 17:15 30:7 53:8 61:23 102:8 128:6 141:3 146:12 159:6 163:22	<b>goes</b> 39:9 56:10 87:9 154:10,11 159:15 <b>going</b> 6:3,5,14,17 7:2,25 12:6,17 23:11 28:8 44:25 62:6 64:5 69:11 78:10 102:14 110:11 111:4 119:4 140:23 154:25 <b>good</b> 5:22 6:24 30:3 30:10 71:13 160:15 <b>governance</b> 48:17 51:23 62:10 <b>governed</b> 100:10 <b>governing</b> 71:9 76:12 <b>government</b> 49:19 49:21 50:16 <b>ground</b> 6:6 <b>group</b> 16:16,21,23 17:3,5,7,18 18:3,6 19:11 36:7,9 38:18 40:24 41:2 41:22 43:15 44:10 44:20 53:21 54:24 55:3,17,22 56:4,9 56:11 57:19 59:17 64:11 68:19,22 69:6,11 74:25 78:5,17 81:11 83:4 85:15 88:23 88:25 95:6,8,10 95:22 128:21 129:14,15,21 131:5 132:17 133:6 137:12,12 139:15 <b>groups</b> 75:22,22 76:5,14 136:25 <b>group's</b> 64:7,24 78:13 129:5,12,18 130:9,24 131:11 133:3,4,8,9,10 <b>Guarantees</b> 140:13	<b>guess</b> 16:10 26:8 142:9 <b>Gui</b> 28:19 <b>Guichot</b> 63:17 <hr/> <b>H</b> <b>half</b> 23:7 24:2 <b>hand</b> 103:7 149:17 167:20 <b>handed</b> 148:22 <b>happen</b> 70:17 89:24 <b>happened</b> 68:25 75:18 <b>hard</b> 118:25 <b>harshest</b> 51:3 <b>head</b> 6:21,21 15:23 43:25 44:13,15 51:8 56:11 57:20 57:21 58:9 77:10 77:13,16 91:11,12 91:13,15 98:23 <b>headed</b> 69:17 70:3 <b>heading</b> 80:11 81:25 83:22 <b>headquarter</b> 141:23 142:8 <b>heads</b> 77:11,19 135:24 136:19 137:6 138:17,20 138:25 139:7 <b>hear</b> 7:4 87:22 101:8 <b>heard</b> 41:6 101:4,6 119:19 120:22 121:7 156:25 <b>held</b> 2:8 62:2 75:5 76:15 91:23 107:6 <b>help</b> 155:22 156:10 156:21 <b>helpful</b> 151:15 <b>hereinbefore</b> 167:11 <b>hereunto</b> 167:20 <b>HEUBERGER</b> 4:22 5:2 <b>Hickey</b> 1:5 6:2
--	--	---	---	---



24:16,17 25:4,10 35:13,25 36:2,23 36:24 37:3,13,25 109:21 110:14 120:16 126:11,15 126:19 127:5 146:10 168:3 <b>hierarchy</b> 89:12 <b>high</b> 11:4 <b>highest</b> 85:14 103:23 157:11,16 <b>hire</b> 31:4,21 <b>hired</b> 33:4,14 <b>Hoffmeister</b> 93:7 105:11 <b>holding</b> 46:8,9,17 46:18 47:5 59:12 59:13 63:8,12 98:22 103:12 129:5,12,17 133:2 <b>holds</b> 59:24 88:6,7 116:23,25 <b>hope</b> 85:2 <b>hour</b> 23:7 24:2 27:21 <b>hours</b> 23:5,9 <b>human</b> 134:8,19,21 134:24 136:23 <b>Humans</b> 105:9 <b>hundred</b> 85:22,23 86:4 <b>hyphen</b> 18:17 <b>hypothetical</b> 70:8,9 101:16,17 <b>H-O-F-F-M-E-I-...</b> 18:18	136:22 <b>impact</b> 82:11 <b>implemented</b> 135:13 <b>important</b> 68:22 69:3,9 136:14,19 137:6,9,13 <b>improper</b> 26:16 27:3 <b>inaccurate</b> 53:3,4 125:5 <b>include</b> 65:5 69:15 77:2,8 81:14 <b>includes</b> 65:7 138:20 150:18 <b>including</b> 75:7 139:11 <b>incorrect</b> 61:10 <b>independent</b> 50:19 138:11,13 <b>indicated</b> 96:21 97:10,10 146:4 150:15 151:11 163:4 <b>indicating</b> 125:4 <b>indirect</b> 114:13,15 <b>individuals</b> 90:24 92:10,17 93:25 94:10 95:18 <b>Industrei</b> 40:8,11 40:13,17 <b>industrial</b> 53:22 137:12 <b>industry</b> 161:17 162:5,25 163:10 163:16 <b>information</b> 57:10 68:24 69:4 80:25 84:4,11 89:19 90:10,11 99:12 110:13,16 133:23 133:24 134:5 154:3,17,21,22 <b>informed</b> 68:9,13 68:17,19 <b>inhibit</b> 10:5 <b>innovation</b> 76:16	136:24 157:7 <b>insofar</b> 57:8 <b>inspect</b> 149:19,19 <b>inspection</b> 146:15 146:22 147:25 148:3,8,18 166:10 166:15 <b>inspections</b> 149:23 <b>inspired</b> 141:22 <b>instances</b> 157:10 <b>instruct</b> 87:16 <b>instructing</b> 87:20 <b>instruction</b> 88:7,12 <b>instructions</b> 26:12 <b>instructs</b> 8:10 <b>intended</b> 154:7 <b>intentionally</b> 161:3 <b>interest</b> 29:18 <b>interested</b> 167:18 <b>interlining</b> 36:3,25 38:5,9,16 39:19 39:25 47:2,20 60:12 76:22 77:3 77:5,7 78:6,22 79:3 98:24 99:2,6 103:9,13,17 113:10,12,15,25 114:4,7 119:20 120:4,9,13 139:20 141:6 145:12,18 146:9 148:15,19 151:4 152:18 155:21 156:4,9,17 156:20,25 161:12 162:24 165:18 <b>interlinings</b> 53:23 161:17 <b>internal</b> 55:7,13 105:25 106:4,14 106:15,20 <b>interpret</b> 19:6 45:2 56:22 <b>interpretation</b> 56:23 <b>interpreted</b> 92:25 <b>interpreter</b> 4:22 5:3 13:22 14:4,5,7	14:11,15 19:3,4 19:12,14 27:7 32:16 41:5,10 44:25 45:5,17,18 53:16,18 57:7 60:3,8 77:25 86:15 92:21,22 93:10 96:15,16 101:3,6,7 103:25 103:25 117:25 122:14,15,25 123:2,4 140:18,19 140:25 151:16,20 152:2,4,7,15 153:7,8 158:5,6,9 158:15 159:3,7 162:20 <b>intervene</b> 132:20 142:19,22 <b>intervened</b> 149:22 <b>intervenes</b> 135:19 <b>Intissel</b> 38:21,24 39:3,6 40:18,22 40:25 43:13 117:6 <b>Intisselchina</b> 116:16 <b>inverted</b> 78:2 <b>investment</b> 46:10 <b>investments</b> 106:19 <b>investors</b> 69:8 <b>invited</b> 64:9 75:17 78:15 <b>involve</b> 111:5 <b>involved</b> 36:23 38:8,10,15 41:3 42:14 78:7 109:18 <b>involves</b> 110:25 <b>involving</b> 38:9,15 41:3 75:6 <b>in-house</b> 16:13 <b>in-person</b> 23:8 <b>Isabelle</b> 63:17 <b>issue</b> 36:2 84:24 120:16,21 132:4 <b>issued</b> 145:8 <b>issues</b> 36:24 106:4 <b>item</b> 134:9	<b>items</b> 133:16 <b>I-N-D-U-S-T-R-...</b> 40:12 <b>I-N-T-I-S-S-E-L</b> 38:21 <hr/> <b>J</b> <hr/> <b>jackets</b> 155:22 156:10,21 <b>job</b> 1:25 71:13 <b>Joelle</b> 18:12,16 19:21 22:13 23:12 23:13 27:10,11 52:24 90:20 91:9 93:6,7 94:7 105:10 119:15 135:4 149:21 <b>judge</b> 156:7 <b>July</b> 35:21,23 <b>June</b> 1:18 2:4 164:7 <b>J-O-E-L-L-E</b> 18:16 <hr/> <b>K</b> <hr/> <b>K</b> 164:2 <b>keep</b> 7:3 118:3 <b>kept</b> 99:20 <b>key</b> 75:6,7,16 77:4 77:4,7 134:23 <b>kind</b> 39:22,23,24 89:15,19 92:19 137:12 <b>kinds</b> 104:11 106:5 <b>Kleber</b> 30:17,23 57:24 <b>knew</b> 70:16 <b>know</b> 6:15 7:18 8:17,17 12:5,23 13:23 15:18 16:8 16:9,11 17:21 19:23 20:2,15 21:15 24:10 25:8 26:5,9 31:22 32:3 33:7 34:3 36:17 36:21 37:2,10 38:4 39:20,21 42:13,16 43:6 45:6 46:3,11 51:7 65:20 66:25 67:8
--	--	--	--	---

67:12 69:10 78:7 79:3 83:23 86:22 86:22,25 87:11,12 90:8,11 92:24 94:22 95:13,16 98:9,12 99:7,8 103:18,21 108:8 108:11,17,21,22 112:21,22 113:7 113:18,19,20,23 114:6,11,17,18,21 114:25 115:3 117:11,14 120:7 120:10,11,12,19 120:20 124:14 125:25 126:22,23 127:23 128:5 130:25 133:19 134:24 135:5 139:13,15 140:8 140:16 141:9,10 141:14 142:2,4,6 142:12 143:5,7,23 144:17 145:5,11 145:16,17 146:2,5 146:6,11 148:5,8 148:10,11,13,14 148:18,20,23 149:4,7,8,12,25 150:3 152:21 153:18 155:7 156:5,9,15 158:10 158:16,17 159:9 159:11,12,15,21 <b>knowledge</b> 16:3 20:21 29:24 83:8 87:8 112:13 113:8 124:21 125:24 135:5 153:13 156:4,7 163:19 <b>known</b> 48:3 86:2 <b>know-how</b> 156:7 163:19 <b>Korea</b> 41:16,25 42:11,19,21,24 43:4,14 <b>Korvan</b> 42:25	<b>KPF</b> 1:9 <b>K-O-R-V-A-N</b> 43:3  <b>L</b> <b>L</b> 164:2 <b>labor</b> 86:10,19 <b>LaFemina</b> 1:24 2:11 5:5,10 167:6 167:24 <b>Lai</b> 28:16 77:23 139:3 <b>Lainière</b> 28:5 43:21,23 121:3,8 <b>Lainiere</b> 115:7 118:13 141:17 165:12 <b>LAINIÈRE</b> 1:9,10 1:11 3:12,13 4:4,5 <b>Lanfranchi</b> 90:21 91:15 93:9,18 94:8 <b>language</b> 10:22 11:9 144:11,14 147:8,13 154:10 154:18 155:11 157:23 160:23,24 <b>Laniere</b> 116:2 <b>larger</b> 94:24 95:3 <b>largest</b> 46:3 <b>Laurent</b> 93:8,21 97:2 <b>law</b> 16:9 44:22,24 45:3,4,8,11 48:24 100:10 <b>lawsuit</b> 24:8 31:6 38:7 39:12 40:7 40:19 41:3 43:15 109:15 113:21 119:22 120:17 126:23 127:2,5,13 <b>lawsuits</b> 38:9 <b>lawyer</b> 12:9,14 33:14,15 127:9 <b>lawyers</b> 16:4 <b>LDP000101</b> 139:21 165:19 <b>LDP000145</b> 139:22	165:20 <b>LDP00101</b> 140:5 <b>LDP003900-LDP...</b> 146:17 166:11 <b>LDP003900-11</b> 147:7 <b>LDP003912</b> 147:11 <b>LDP003912-LDP...</b> 146:24 166:16 <b>LDP003923</b> 143:20 144:13 <b>LDP003923-LDP...</b> 166:8 <b>LDP003924</b> 143:21 <b>LDP003925</b> 143:14 165:24 <b>LDP003925-27</b> 144:9 <b>LDP003927</b> 143:15 165:24 <b>LDP003928</b> 115:15 <b>LDP003928-LDP...</b> 115:10 165:14 <b>LDP003942</b> 115:15 <b>Leach</b> 60:17,18 <b>leaders</b> 161:16 162:24 <b>leading</b> 53:21 71:10 151:3 <b>Leah</b> 60:7,14,15 <b>lean</b> 56:11 57:20,21 58:9 <b>learn</b> 11:2 12:8,16 68:21 <b>leaving</b> 23:19,22 <b>left</b> 55:12 <b>left-hand</b> 49:24 <b>legal</b> 13:20 15:6,10 15:23,24 16:15,20 17:17,20,22 18:11 31:4,5 32:11,12 40:22 44:2,13,16 47:11 51:8 61:2 73:9,16 85:4,13 85:14 97:8,13,13 97:25 98:13 99:20 99:23 100:12	104:17,21 108:21 109:7 118:18 121:12 122:4,19 125:23 154:8,9,13 154:14,16,21 155:10,15 <b>legally</b> 84:18 112:25 <b>let's</b> 17:15 21:10 38:12 48:25 53:8 62:8 82:14 91:7 110:2 115:5 121:15 122:17 128:6 139:17 143:9 144:5 146:12 150:7 151:22 152:9 153:2,6 157:21,22 159:24 160:10 162:17,21 163:22 <b>level</b> 10:21 81:11 <b>liability</b> 9:21 14:2 <b>Light</b> 60:19 <b>limited</b> 13:21 14:2 116:17 117:6 <b>line</b> 158:11,11,12 <b>lines</b> 56:12,16 64:8 64:24 65:2 68:6 69:20 75:24 78:14 <b>lining</b> 1:13 4:13 155:22 <b>listed</b> 46:16 54:8 56:17 80:10 81:17 81:24,25 83:20,22 83:24 84:7 133:16 134:9 142:19 <b>lists</b> 79:14 80:3 116:11 129:8 <b>litigation</b> 21:6 38:2 38:15 39:5 40:4 40:15,16 42:6,17 42:18 43:8 121:24 126:4,10,15,19 127:16,25 <b>little</b> 42:4 137:4 <b>live</b> 10:13 <b>lived</b> 11:22	<b>LiveNote</b> 2:12 167:7 <b>LLP</b> 2:9 3:5,14 4:6 4:14 <b>local</b> 43:8 <b>locate</b> 110:12 112:4 <b>located</b> 30:14,22 57:21 58:3,6 122:6,22 123:10 123:21 <b>Loeb</b> 2:9,9 3:5,5 <b>long</b> 23:3,21,24 27:20 43:25 44:15 143:24 153:23 <b>longer</b> 59:9 84:18 <b>look</b> 21:16 57:12 80:15 83:15,15 110:2 115:22 144:16,18 151:10 153:4 158:8 161:20 <b>looked</b> 74:23 83:19 118:18 119:18 144:22 <b>looking</b> 140:4 157:20 <b>losing</b> 70:16 <b>lot</b> 120:15,18,21 <b>lots</b> 120:23,24 <b>LP</b> 24:17,18,18 25:3,3,3 28:4 29:19,20 112:18 112:19 114:22,24 117:4 119:24 120:3 126:22,25 127:9,11 145:9,14 147:25 148:3 149:20,24 <b>LPW</b> 149:24 <b>LPWJ</b> 146:14,21 166:9,14 <b>lunch</b> 91:25 92:8 <b>L-A-U-R-E-N-T</b> 93:21 <b>L-E-A-C-H</b> 60:17 <b>L-E-A-H</b> 60:8,16
--	---	---	--	---

M				
<b>M</b> 164:2 <b>main</b> 46:7 75:24 79:14,23 80:11 81:25 83:22 <b>maitrise</b> 45:16,18 <b>majority</b> 115:2 <b>making</b> 69:16 85:18 <b>manage</b> 130:8 131:11,14,15 132:8 <b>managed</b> 97:15 132:13 <b>management</b> 36:5 36:8,10,13,22 37:4 76:16 95:19 95:21,23 96:11,14 96:20,23 97:7,8 97:12,22,24 98:3 132:21 142:20 <b>manager</b> 71:24 72:6,11,13 73:10 73:20 77:9,11 82:9 97:18 <b>managers</b> 96:3 98:2 132:12,23 <b>manages</b> 46:19 <b>managing</b> 46:21 64:7,18,23 65:5,7 65:20 68:5 70:22 70:24 71:12 72:4 72:13,17,20 73:13 73:14,24 75:12 78:13 88:15 96:24 97:5 98:6,15,18 101:19 130:2 131:14 133:14,15 <b>mandate</b> 73:19 74:9 <b>manning</b> 73:17 <b>Manuel</b> 28:14 <b>manufacture</b> 98:24 99:6 103:9,17 113:13 119:24 120:8 139:12 <b>manufactured</b>	120:3,13,15,24 145:12 <b>manufactures</b> 113:25 <b>manufacturing</b> 53:20 113:11 135:9,17 142:16 146:8 <b>March</b> 50:6 <b>mark</b> 21:10 48:25 115:5 139:17 143:9 146:13 150:7 <b>marked</b> 21:13 49:4 115:12 139:22 143:15,21 144:8 146:19 147:2 150:11 160:17 <b>market</b> 4:7 46:2,16 50:25 51:6 83:12 157:11,16 <b>marketed</b> 158:11 <b>marketing</b> 130:15 130:18,22,25 131:3,8,8 <b>markets</b> 50:4,15 53:22 <b>Marlien</b> 77:24 78:3 139:3 <b>marriage</b> 167:17 <b>master's</b> 45:4,8,19 <b>Material</b> 146:15 166:9 <b>materials</b> 148:2,3 <b>Mathieu</b> 90:22 91:13 <b>matter</b> 39:11 167:18 <b>matters</b> 29:23 32:13 67:25 94:18 149:23 <b>mean</b> 10:19 11:10 17:2,5 28:5 31:11 31:24 32:4 33:15 34:6,14 36:8 38:11 39:24 46:21 48:18 54:22 59:25	65:4 71:19 76:2 76:19 80:14 81:5 82:6,11 84:25 85:6 86:19 89:11 89:18 95:10 99:17 103:2 104:17 107:2,8 112:25 119:12 123:13 130:21 131:13,25 132:8,19,24 133:4 137:15,18,19 138:10,15 142:8 152:10 155:8,8 <b>meaning</b> 39:25 57:10 123:11 <b>means</b> 46:23 80:18 81:22 82:8 133:20 141:10 142:6,25 153:24 <b>meant</b> 83:17 88:6 <b>measures</b> 70:25 <b>medical</b> 10:4 <b>medication</b> 10:5 <b>meet</b> 22:16 34:20 34:23 35:7 36:15 67:24 68:3,5 90:6 95:14,15 107:11 107:14 <b>meeting</b> 22:24 23:8 35:19,23 52:8 66:9,11 67:8,15 89:25,25 90:4 138:18 <b>meetings</b> 9:10 35:2 35:14,16,17,25 36:19,22 37:4,14 37:23 64:9 66:7 66:18 78:15 90:14 90:15,18,19 92:16 93:3 94:20 100:3 100:4 <b>members</b> 63:2,16 95:11 96:11,18 118:12 <b>menswear</b> 151:3 161:12,17 162:5 162:25 163:9,16	<b>mention</b> 120:22 <b>mentioned</b> 14:21 42:6 47:19 90:25 92:15 108:4 121:22 136:3 <b>mergers</b> 91:15 <b>met</b> 64:17 107:17 <b>methods</b> 82:17 <b>Michael</b> 63:7 89:4 89:13 90:5 94:15 96:19 <b>middle</b> 55:11 <b>mind</b> 25:19 79:8 93:15 130:16 <b>minority</b> 115:4 <b>minute</b> 61:24 <b>minutes</b> 8:16 23:23 66:24 67:15 100:3 148:23 160:3,5 <b>mischaracterizing</b> 128:3 <b>misspeak</b> 61:3 <b>mistake</b> 104:2 <b>mistakes</b> 53:7 <b>model</b> 119:19,25 120:4,13 145:12 145:18 148:19 <b>models</b> 148:14 <b>moment</b> 53:9 63:4 <b>money</b> 70:16 <b>monitoring</b> 48:21 <b>month</b> 12:19 34:2,2 <b>monthly</b> 90:4,15,19 92:16 <b>Morgan</b> 3:15 8:4 12:11 14:3,8 16:22 18:7 19:10 19:16 20:4,18 21:3 22:11,17,18 22:23 23:15 24:4 24:11,19,25 25:25 26:6,14,17,20 27:5,8 29:14 30:4 31:24 32:6,21 38:10 44:5 45:12 49:6 53:14 55:23 56:7 59:25 64:20	66:21,25 70:6,18 72:22 73:3 78:24 80:19,22 86:13 87:16,22 88:5 90:2 91:2,19 93:12 99:21 100:17 101:15 102:3 104:14 109:6 110:23 111:7,21 112:25 119:9,14 123:11 127:7,18 128:2 130:10 131:25 141:12 143:23 144:4 150:5 151:24 152:5,12 152:21 155:3,13 157:18 158:3 160:3,12 161:2,7 162:8 <b>morning</b> 5:22 23:20,24 27:19 <b>MOSKOWITZ</b> 4:14 <b>mother</b> 59:23 60:21 61:9,18 102:24 103:2
				N
				<b>N</b> 3:2 4:2 164:2,2 165:2 166:2 <b>name</b> 5:16,25 13:20 18:14 38:22 40:6 47:10,11,20 48:10 48:13,15,16 62:4 62:6 63:6 141:7 168:3,4 <b>named</b> 19:20 20:2 20:10 38:11,13 <b>names</b> 93:16,19 <b>NASSAU</b> 167:5 <b>Natale</b> 27:22 <b>nature</b> 134:21 154:19,21 <b>necessarily</b> 34:14 <b>necessary</b> 8:23 29:20

<p><b>need</b> 6:18 8:14,14 34:14 59:17 67:24 68:13 87:22 106:16 151:25 158:7,24 <b>needs</b> 68:16,19 91:4 96:16 137:21 137:24 <b>neither</b> 37:7 72:9 155:9 <b>network</b> 113:20 <b>Neuilly-Sur-Seine</b> 5:21 10:16 <b>never</b> 6:12 38:14 70:10 73:6 135:18 <b>new</b> 1:3,19,19 2:10 2:10,14 3:8,8,17 3:17 5:6,11 6:13 23:19,22 60:6 75:5 76:12 135:14 157:8 158:22 159:20 167:3,9 <b>Nicolas</b> 63:15 <b>NIEDERER</b> 4:15 <b>nine</b> 34:24 <b>nodding</b> 6:21 <b>non-legal</b> 100:14 <b>non-woven</b> 40:3 <b>Notary</b> 2:13 5:5,10 164:22 167:8 168:23 <b>note</b> 26:18 27:3 96:19 140:4 147:6 150:17 <b>noted</b> 32:9 91:24 163:24 <b>Notice</b> 21:13,21 29:10 165:8 <b>noticed</b> 110:9 <b>notified</b> 31:8,9 <b>noting</b> 54:25 <b>Novacel</b> 15:2 41:16 41:24,25 42:11,19 42:21,24 43:4,13 <b>number</b> 6:3 22:20 23:17 39:9 50:5 118:7 145:22</p>	<p><b>numbered</b> 118:8 <b>numbers</b> 115:10 139:21 143:14,20 146:16,23 165:14 165:19,23 166:8 166:11,16</p> <hr/> <p style="text-align: center;"><b>O</b></p> <hr/> <p><b>O</b> 164:2 <b>oath</b> 9:16 92:6 121:20 164:6 <b>object</b> 8:5 16:22 18:7 <b>objection</b> 8:7 20:18 26:18 27:4 29:14 30:4 32:6 44:5 45:12 55:23 64:20 70:6,18 72:22 73:3 78:24 88:6 90:2 99:21 100:17 101:15 102:3 104:14 109:6 111:21 127:7,18 128:2 130:10 155:3,13 <b>objections</b> 108:15 <b>objects</b> 8:9 <b>obligation</b> 69:8,12 69:15 <b>obtain</b> 99:15 104:9 107:24 109:4 112:10 121:23 <b>obtained</b> 150:2 <b>obtaining</b> 57:10 <b>obviously</b> 111:4 <b>occasion</b> 68:7 <b>office</b> 56:12 57:20 57:21,23 58:2,5,9 <b>officer</b> 15:25 97:3 <b>offices</b> 2:9 30:19 31:2 <b>official</b> 117:19 <b>Oh</b> 60:17 91:5 101:6 128:9 160:14 <b>okay</b> 6:22,23 7:6,7 7:20 14:11 17:15</p>	<p>19:16 27:7 45:5 82:14 84:15 85:12 101:7 119:23 128:9 140:25 151:21 152:15 153:8 161:7 <b>old</b> 10:9,10 11:5 <b>Olivier</b> 93:9,23 105:12 119:17 <b>once</b> 23:19,20 48:3 107:17 147:21 <b>ones</b> 38:20 41:15 58:11 94:6,14 109:16 132:13 <b>open</b> 9:19 159:19 <b>opened</b> 158:22 159:10,13 <b>operation</b> 59:5 <b>operational</b> 15:15 <b>operations</b> 47:6 132:16,19 133:17 133:20,21 154:23 158:19 <b>opposed</b> 6:20 20:16 102:18 <b>oral</b> 10:24 <b>order</b> 68:3 121:23 136:11 <b>organization</b> 95:7 107:4 <b>organize</b> 136:8 <b>organized</b> 56:11 57:20 64:11 74:24 75:10 78:17 108:12 135:24 <b>organizing</b> 136:17 <b>orientation</b> 137:22 <b>original</b> 115:18 122:18 143:13,19 144:11,14 147:9 147:13 165:22 166:6 <b>originally</b> 115:16 <b>outcome</b> 167:18 <b>outlook</b> 137:11,14 137:16,19 <b>outside</b> 31:5 33:4</p>	<p>34:16 <b>outstanding</b> 67:19 <b>oversee</b> 57:9 <b>oversees</b> 50:14 56:12 <b>oversight</b> 99:4 103:15 <b>owned</b> 45:24 85:21 86:4 117:5 121:5 121:10,14 129:22 <b>owners</b> 118:12 <b>ownership</b> 118:22 <b>owns</b> 46:23,25,25 47:2,3 85:23 103:4 114:21,23 115:2,4 <b>O-L-I-V-I-E-R</b> 93:23</p> <hr/> <p style="text-align: center;"><b>P</b></p> <hr/> <p><b>P</b> 3:2,2 4:2,2 <b>page</b> 49:23,25 51:25 53:13,15,19 54:25 55:5,8,12 57:2,5 62:8,9 63:19,25 74:18,22 78:9,11 79:12,14 82:14 83:20 96:4 110:3,4 115:22,24 115:25 116:11,20 116:21 117:21,22 117:25 118:3,5,8 118:9 119:3 128:12,13 140:11 141:9,11,16 150:16,25 151:11 151:15 152:20 153:4 155:20 157:5 158:19 161:11 165:4,7 166:4 <b>pages</b> 141:16 <b>PAGE/LINE(S)</b> 168:5 <b>paid</b> 40:22 <b>papers</b> 99:18,20 <b>paragraph</b> 49:24</p>	<p>55:11 63:25 74:22 74:23 78:10 79:4 82:22,24 110:4,5 115:23 129:20 150:24 152:20,23 153:18 155:20 158:18 <b>parent</b> 79:20 85:18 86:23 87:11 103:7 114:19 128:21,23 129:4 133:2 <b>Paris</b> 30:15,17,23 57:22 95:16 <b>Park</b> 2:9 3:7,16 <b>part</b> 11:15 67:11,21 73:11 97:6,22,24 100:16 117:10 125:6,7,9 126:15 126:19 127:16,25 131:21 138:2 <b>participate</b> 78:5 90:13 139:14 159:18 <b>participated</b> 66:17 <b>participates</b> 93:2 <b>particular</b> 47:6 76:10 79:2 90:5 137:6 <b>particulars</b> 90:12 <b>parties</b> 24:7,13,14 40:7 105:25 106:10,14 109:15 109:16 116:13 167:16 <b>partners</b> 118:12 <b>partnerships</b> 91:14 <b>parts</b> 139:11 <b>party</b> 38:11,13 40:6 40:24 43:15 116:13,16,22,23 116:23,24 <b>Patrick</b> 93:11,22 97:4 <b>Paullier</b> 93:8,20 <b>pay</b> 40:18 43:5 <b>payment</b> 40:24 <b>pays</b> 134:16,16</p>
--	---	--	---	---

<p><b>pending</b> 27:9 74:21 91:7</p> <p><b>Pennsylvania</b> 4:8</p> <p><b>penultimate</b> 150:24 152:19 155:20</p> <p><b>people</b> 15:21 34:14 36:6 75:6,7,8,17 77:4,5,8 90:6 111:11 124:6 134:23 138:23 139:4,10 143:5</p> <p><b>percent</b> 85:22,24 86:5</p> <p><b>periodic</b> 89:16,23</p> <p><b>periods</b> 120:12</p> <p><b>Perronet</b> 5:20</p> <p><b>person</b> 17:23 18:10 19:20 20:16 21:24 63:11 96:24 143:4</p> <p><b>personal</b> 20:21</p> <p><b>personnel</b> 16:20 17:18,20 18:5 154:9,10,13 155:10,15</p> <p><b>persons</b> 105:5,7,8</p> <p><b>pertain</b> 145:11</p> <p><b>Peter</b> 77:23</p> <p><b>Petit</b> 90:21 91:11 93:8 94:8</p> <p><b>Philadelphia</b> 4:8</p> <p><b>phone</b> 22:22,25 23:6</p> <p><b>phrase</b> 54:4</p> <p><b>Physical</b> 105:8</p> <p><b>Picardie</b> 1:10,11,12 3:13,13 4:5,5 28:5 43:21,23 115:8 116:2 121:3,8 141:17 165:12</p> <p><b>piece</b> 162:21,22</p> <p><b>pipeline</b> 67:20</p> <p><b>place</b> 11:9 68:10,14 68:22 95:17 98:5 148:9,12</p> <p><b>Plaintiff</b> 1:7 3:4</p> <p><b>plan</b> 67:22</p> <p><b>plane</b> 9:2,3</p>	<p><b>planes</b> 59:4,5</p> <p><b>plans</b> 67:20</p> <p><b>plant</b> 157:15</p> <p><b>play</b> 51:13 134:8 135:8,12</p> <p><b>played</b> 148:24 149:5,9,13</p> <p><b>please</b> 5:17 7:3,18 8:16 13:15 18:15 21:11 25:12,24 26:9,19,23 30:16 33:20 38:23 40:9 41:19 43:2 49:2 49:23 53:13 55:6 57:6 58:16,23 62:9 63:6,19 64:3 79:12 82:15 87:25 93:16 96:5 110:3 110:3 117:21,21 119:4 128:7,12 138:9 139:18 140:11 144:16,17 144:19 157:5 162:16,19 163:23</p> <p><b>plus</b> 115:11 165:15</p> <p><b>point</b> 35:22 37:22 51:21 81:22 82:5 129:25 133:14</p> <p><b>policy</b> 134:8</p> <p><b>portion</b> 25:21 77:22 88:3 131:23 138:9</p> <p><b>portions</b> 51:21 52:12,14 53:2</p> <p><b>posed</b> 130:20</p> <p><b>position</b> 15:22 18:19 44:19 90:24</p> <p><b>positions</b> 53:21</p> <p><b>positive</b> 64:13 78:19</p> <p><b>possession</b> 29:23</p> <p><b>possible</b> 137:25</p> <p><b>possibly</b> 25:7</p> <p><b>potentially</b> 6:4 9:20</p> <p><b>power</b> 72:10 74:9</p> <p><b>powers</b> 101:20 105:23</p>	<p><b>practical</b> 87:3</p> <p><b>practice</b> 73:7</p> <p><b>precise</b> 156:8</p> <p><b>prefer</b> 84:17 123:16</p> <p><b>premium</b> 53:24</p> <p><b>prep</b> 87:15</p> <p><b>preparation</b> 111:4 145:3 147:22</p> <p><b>prepare</b> 22:7,17 23:14 27:16 28:12 28:17,20,23 29:3 110:21 118:16 119:7</p> <p><b>prepared</b> 82:13 116:7 140:8 148:6</p> <p><b>preparing</b> 148:24 149:6,9</p> <p><b>presence</b> 137:20</p> <p><b>present</b> 4:21 12:21 12:25 64:9 66:5 76:9 77:5,8 78:15 90:7,17 91:18 97:2,6,20 98:20 108:12 138:18,23 138:24 139:4</p> <p><b>presentation</b> 66:15 76:11 96:10</p> <p><b>presentations</b> 75:20</p> <p><b>presented</b> 68:7 73:7</p> <p><b>presenters</b> 75:21</p> <p><b>presently</b> 98:14</p> <p><b>president</b> 68:18 69:9 73:18,21 91:17 97:21,23 98:19 100:6 102:21 104:4 105:22 106:16,22 107:2,4 108:16</p> <p><b>pretty</b> 159:25 161:22</p> <p><b>prevent</b> 9:24</p> <p><b>printed</b> 150:15</p> <p><b>printout</b> 150:9 160:17,20,22</p>	<p>161:6 166:19,22</p> <p><b>prior</b> 35:7,22 36:21 44:10,12,20 56:8 132:2</p> <p><b>privilege</b> 25:11</p> <p><b>privileged</b> 20:7</p> <p><b>probably</b> 127:22</p> <p><b>procedure</b> 24:15 146:15,23 166:10 166:15</p> <p><b>procedures</b> 55:8 71:2 145:10 146:7 148:9,15,19</p> <p><b>process</b> 76:24 77:3 100:9 140:13 143:2</p> <p><b>processes</b> 78:6 135:9,13,17 136:5 136:10,21 137:8 138:5 142:15,22</p> <p><b>produced</b> 76:25 115:16 117:15 142:12 145:14</p> <p><b>product</b> 20:8 21:5 39:13,15,16,18,22 39:23,24 40:3 42:13 43:17 76:25 140:13 146:22 166:15</p> <p><b>production</b> 64:12 68:6 69:20 76:17 76:18,19,23 77:2 78:6,18,22 79:3,7 115:9 135:20 136:5,9,21,24 137:8,23 138:5 139:15,21 142:15 142:22,25 143:14 143:20 146:16,23 147:25 165:14,19 165:23 166:8,11 166:16</p> <p><b>products</b> 41:4 76:19,21 113:24 138:12 139:12 143:2 160:22 162:4 163:6,8,15</p>	<p><b>Professional</b> 2:11 167:7</p> <p><b>proficiency</b> 10:22</p> <p><b>program</b> 45:21 138:3</p> <p><b>promulgates</b> 132:7</p> <p><b>pronunciation</b> 84:21</p> <p><b>proper</b> 98:5</p> <p><b>properly</b> 25:17</p> <p><b>propose</b> 162:3 163:8,14</p> <p><b>protection</b> 47:13 53:23 79:11 124:24</p> <p><b>protective</b> 42:15 47:3,9,10 97:3 125:8</p> <p><b>provide</b> 14:23 15:4 15:8,14 20:11 101:25 109:21 126:10,14,20 127:5,24 154:15</p> <p><b>provided</b> 127:11,15 127:20,22 135:3,7 146:10</p> <p><b>provides</b> 14:24 15:6 134:10,12,20 134:23 151:2</p> <p><b>Public</b> 2:13 5:5,11 164:22 167:8 168:23</p> <p><b>publicly</b> 45:24 142:18</p> <p><b>purchase</b> 59:4</p> <p><b>pure</b> 59:13</p> <p><b>purely</b> 105:25</p> <p><b>purpose</b> 59:2,22 142:5</p> <p><b>purposes</b> 19:8,19 84:2 106:2 156:14</p> <p><b>pursuant</b> 50:6</p> <p><b>purview</b> 72:7</p> <p><b>put</b> 59:21 61:17 143:8 150:4 159:22</p> <p><b>P-A-U-L-L-I-E-R</b></p>
---	--	---	--	--



93:21 <b>p.m</b> 9:5,6,7 91:24 92:2 163:24	<b>rapid</b> 157:7 <b>raw</b> 146:14 148:2,3 166:9 <b>read</b> 11:3 25:21 52:16 64:5 88:3 110:11 131:17,23 132:4 144:21 164:5 <b>reads</b> 57:2 <b>ready</b> 57:14 <b>really</b> 90:11 132:18 132:24 <b>reask</b> 14:12 122:17 <b>reason</b> 20:11 84:6 168:5 <b>reasonable</b> 9:14 <b>recall</b> 10:6 43:18 139:13 <b>receive</b> 126:24 127:4 <b>received</b> 31:10 32:8 32:20 122:9,12 123:5,9 124:6 <b>receives</b> 133:22,23 134:5 <b>recess</b> 32:24 53:10 67:4 91:25 121:17 144:6 160:6 <b>recognize</b> 150:21 <b>recollection</b> 121:12 <b>reconfirmed</b> 123:16 <b>record</b> 5:16 7:14 8:7,7 13:14 18:15 25:21 26:13 33:18 37:21 53:9 61:24 62:2 64:6 88:3 91:23 105:15 140:5 147:6 150:17 152:9 157:18 160:19 163:23 164:9,12 167:13 <b>records</b> 99:15,17 100:2 104:9,18 124:2 <b>rectification</b> 42:5	66:17 <b>rectify</b> 38:25 <b>redacted</b> 161:9 <b>REF</b> 168:4 <b>refer</b> 17:11 54:15 55:21 88:24 95:4 117:20 <b>reference</b> 49:13 51:16 52:17 75:4 80:7 83:10,10 85:18 140:17 141:6 <b>references</b> 158:20 <b>referred</b> 61:8 81:10 96:7 <b>referring</b> 17:10,12 31:14,17 34:11 41:11 54:24 56:8 62:17,20 65:17,18 72:12,13 85:10 89:2 109:17,19 129:13,16 <b>refers</b> 54:20 74:24 97:8 128:24 131:8 133:10 141:15 143:7 <b>reflect</b> 33:19 157:19 <b>reflected</b> 118:21 <b>refrain</b> 26:25 <b>regard</b> 42:5 87:17 100:5 106:10 <b>regarding</b> 29:23 67:9 78:5 79:2 89:10,15 106:17 118:22 136:9 153:16 <b>regards</b> 21:6 <b>Registered</b> 2:11 116:21 167:6 <b>registration</b> 49:4 50:3 53:13 128:7 128:8 165:10 <b>regrouped</b> 138:25 <b>regular</b> 107:12 <b>Regularly</b> 11:16 <b>regulated</b> 154:19	154:19 <b>regulations</b> 50:8 <b>relate</b> 52:5 134:18 <b>related</b> 22:12 59:3 145:7 149:23 154:18 167:16 <b>relation</b> 87:10 100:12 106:13,18 106:22,23 107:14 <b>Relationships</b> 128:13 <b>rely</b> 140:24 <b>remember</b> 12:18 32:19 33:23 35:11 35:16,18,20 39:17 40:21,23 43:7 83:21 86:16 92:12 92:20 107:7,20 118:23 133:7 135:22 136:6 138:22 139:9 <b>remove</b> 74:6 <b>render</b> 69:20 <b>rep</b> 19:2,5,18 20:3 20:24 <b>repeat</b> 14:8 25:12 25:15,16 30:8 86:16 122:25 <b>repeats</b> 123:4 <b>rephrase</b> 7:19,23 16:10 19:13 25:14 <b>report</b> 16:17 52:6 89:9,11 93:2 <b>reported</b> 1:23 69:24 <b>reporter</b> 2:12,12 6:16 25:22 88:4 167:7,8 <b>reports</b> 88:23 89:4 89:12,14,23 90:7 90:9 92:10,18 <b>represent</b> 6:2 8:19 29:18 49:15 97:10 150:13 <b>representative</b> 19:7 105:16,17 <b>represented</b> 96:23	<b>representing</b> 112:22 113:2,3 <b>represents</b> 63:12 73:15,15 105:11 105:13 <b>request</b> 101:12 162:8 <b>requested</b> 25:20 88:2 <b>requests</b> 110:15 <b>require</b> 9:11 15:13 <b>reread</b> 78:10 87:24 <b>rereading</b> 54:17 <b>reside</b> 5:19 <b>resolution</b> 52:7 <b>resolved</b> 43:11 <b>resource</b> 134:21 136:23 <b>resources</b> 134:8,19 134:25 <b>respect</b> 36:3,25 51:9 86:12,21 99:23 103:16 105:24 119:6 135:5 138:15 148:21 <b>respective</b> 96:3 97:9,19 137:23 <b>respond</b> 24:21 <b>response</b> 6:20 157:8 <b>responses</b> 6:17,18 7:5 <b>responsibilities</b> 99:5 <b>responsibility</b> 13:24 51:18 52:13 69:13 70:22 72:10 97:18 103:16 105:20 <b>responsible</b> 42:22 74:2 85:15 <b>responsive</b> 110:14 110:15 <b>rest</b> 91:20 <b>restate</b> 152:24 <b>restricted</b> 136:16
<b>Q</b> <b>QC</b> 146:15,22 148:8 166:10,15 <b>quality</b> 53:24 145:8 145:9 <b>quarter</b> 27:21 <b>question</b> 6:19 7:11 7:12,17,22,24 8:8 8:10 14:13 16:11 18:2,8 19:5 21:4 24:21,24 25:13,17 26:2 27:8 30:7,8 30:11 32:14 34:10 37:11,15,21,21 41:7 61:14 65:3 65:16 67:16 72:2 74:20,21 78:20 85:17 87:23 88:8 88:11 89:20 91:3 91:6 92:25 95:3 102:10 119:6 122:18 123:2,4,15 130:20 137:4 152:13,24 155:6 157:2 161:8 <b>questioner</b> 32:9 <b>questions</b> 6:4,18 7:2 8:5,16 9:25 26:23 92:9 <b>quite</b> 118:24 128:10 137:13 <b>quote</b> 50:2 64:6 78:12 <b>quoted</b> 45:25 50:24 158:4	<b>R</b> <b>R</b> 3:2 4:2 167:2 <b>Ragueneau</b> 63:18 <b>raised</b> 36:2,24 <b>range</b> 162:3 163:8 163:15 <b>ranked</b> 18:10 <b>ranking</b> 103:23			

<b>result</b> 42:16,18	<b>Robin</b> 1:24 2:10	65:19,23 78:11	83:5,6,16 96:12	56:10,15,22 57:8
<b>results</b> 40:14 69:22	5:4,10 87:25	79:16,19,23 80:6	96:13,18,21,22	117:13 129:16,25
70:25 71:7 81:18	167:6,24	82:17,19 83:2	110:4,5,17,19	150:25 151:14
<b>resumed</b> 92:2	<b>role</b> 51:8,9,13 72:8	96:10 110:12	116:4,6,14,18,19	152:14,19 153:9
<b>retain</b> 155:23	97:17 102:23	115:25 116:12,21	117:2,7,23,24	153:12,15,21,23
156:11,22	128:20 134:7	118:7,11 128:13	118:7,14 128:15	154:20 155:19
<b>retranslate</b> 25:24	135:9,12 148:24	128:17,20 129:3	128:17,22 129:6,7	156:3 158:4,20,25
<b>review</b> 28:25 29:5,7	149:5,9,13,18	129:11,17 130:2	130:4,5 133:18	159:4 162:2,18,22
154:10	<b>roles</b> 51:7 71:2	130:24 132:25	140:14,15 141:5	163:7,12
<b>reviewed</b> 22:12	<b>room</b> 91:20	133:13,15 140:12	141:19,24 143:6,6	<b>sentences</b> 83:16
24:3,11,25 25:8	<b>Rothschild</b> 3:14	141:17,21 142:25	145:20,24,25	<b>September</b> 44:17
53:2 154:25	4:6 12:14 29:17	153:21 155:20	151:5,6 153:9	<b>serve</b> 20:24
155:10	33:16,17 111:2,6	157:6 161:12,15	157:12 158:20,23	<b>served</b> 31:19 32:3,9
<b>reviewing</b> 21:17	111:8 119:11,17	162:3,22 163:3,7	161:13,18,23,25	33:6
52:14 54:16,19	127:12,15,22,25	<b>scheduled</b> 9:10	162:6 163:11,12	<b>server</b> 100:21,23
56:14 57:13	<b>roundtable</b> 136:4,9	<b>school</b> 11:4	<b>seen</b> 21:19 49:9	108:5,6,10,11
110:18 117:9	<b>Rousseau</b> 27:16	<b>scope</b> 55:12 106:24	115:20 139:24	111:10,14,18,20
140:2 144:20	77:17 119:16	<b>SD75</b> 39:16	140:7 141:4	112:20 122:2,7,10
147:5,17 153:14	<b>Rue</b> 5:20	<b>Seah</b> 77:23	144:23 147:15,18	122:22 123:7,10
153:22 155:4	<b>RULE</b> 2:7	<b>search</b> 111:9,13	147:21 155:17,18	123:18,21,25
157:17	<b>rules</b> 6:6 71:5,8,9	121:25 126:3,9,17	<b>segment</b> 80:7 83:25	124:9,13,16,19
<b>revised</b> 146:3	76:12	<b>searching</b> 126:6	84:8	125:11,15,19,22
<b>revision</b> 145:23	<b>R.18-006</b> 50:6	<b>second</b> 23:6 49:22	<b>select</b> 20:16	126:3,6
<b>right</b> 6:7 9:17		115:24 118:3	<b>selected</b> 95:12	<b>servers</b> 126:9
14:15 21:22 24:4	<b>S</b>	129:25 130:14	<b>sell</b> 99:2,6 103:13	<b>service</b> 13:13 14:22
24:5 36:7 37:6,9	<b>s</b> 3:2 4:2 21:22	133:14 155:19	103:17 113:12,14	53:23 134:22
39:4,7,19 47:17	40:13 69:14	157:5 163:7	113:15,16 114:4,7	<b>services</b> 14:22,24
47:22 48:5 52:2,9	126:21 127:3	<b>secondly</b> 149:20	<b>sells</b> 113:23	15:4,8,13,15
54:12,13 55:4	154:8	<b>secretary</b> 18:13,19	<b>seminar</b> 75:5,10,19	134:10,11,11,12
56:3,18 58:4,7	<b>sales</b> 76:17 113:19	91:10	75:25 135:23	134:16,17,18,20
60:23 62:15,25	130:13,21 131:9	<b>section</b> 51:24 52:4	136:17 137:2	134:25 135:3,6
63:23 65:9,12	<b>salespeople</b> 77:12	52:4 62:13 63:24	138:23,24	143:2 154:16
66:13 67:3 69:17	<b>Sampierro</b> 90:21	80:25 81:24 82:23	<b>seminars</b> 64:11	<b>servicing</b> 53:21
70:3 77:15,18	91:15 93:9 94:8	132:25 153:15	74:24 78:17	<b>serving</b> 18:25
79:5 80:5,9 81:2	<b>sanction</b> 50:22,24	<b>sections</b> 51:15,18	<b>send</b> 11:11	19:17
85:4 86:2 88:20	51:3	52:5	<b>Senfa</b> 15:2 46:25	<b>set</b> 80:16 132:22
98:17 104:7	<b>sanctions</b> 71:8,18	<b>sector</b> 97:9 139:10	59:24 60:4,5,9	167:11,20
105:18,19 107:9	71:20	139:11	125:9	<b>seven</b> 23:9
107:10,10 114:2	<b>SAS</b> 1:10 3:13 4:5	<b>secure</b> 106:16	<b>senior</b> 16:15,20	<b>shaking</b> 6:21
121:5 122:2,3	<b>saw</b> 118:25	<b>see</b> 49:23 50:9	17:17 18:4,5	<b>shape</b> 155:24
123:3 125:18	<b>saying</b> 14:4 37:8	53:18,25 54:5,9	<b>senior-most</b> 15:24	156:11,22
128:10 129:10	66:25 92:20	55:7,14,15,18,18	<b>sense</b> 89:19,22	<b>share</b> 60:4 108:6
131:19,25 136:7	127:14,17	55:20 56:13,15	105:7 134:22	124:15,18 125:11
139:6 149:15	<b>says</b> 50:2 53:20	62:11 63:22 64:4	135:2	125:15,22
155:12 162:12,17	54:14 55:7,12	64:14 75:2 79:13	<b>senses</b> 125:4	<b>shared</b> 52:23 126:7
<b>right-hand</b> 63:20	57:19 62:10,16	79:18,21,22,25	<b>sentence</b> 53:19	<b>shareholder</b> 46:4,7
<b>right-most</b> 82:16	63:20 64:23 65:18	80:2 82:16,20,24	54:3,17 55:16	99:25 100:2,3

<b>shareholders</b> 46:12 69:12,13,15 100:5 100:7,10 116:12 118:12	66:4,16 91:2 93:10 96:15 104:2 106:7 118:5 122:16 128:9	<b>stapler</b> 160:12 <b>start</b> 6:5 38:12 80:17 153:2 162:17	103:22 155:24 156:11,22	74:10,11,12 104:24 105:2,6,15 105:21 106:3,12 106:17 107:11,16 107:23
<b>shareholding</b> 116:12	<b>sort</b> 36:10	<b>started</b> 40:7 70:11	136:14,23,25 137:13,17	<b>supplies</b> 134:14
<b>shareholdings</b> 102:24	<b>sound</b> 6:7	<b>starting</b> 82:23	<b>subjects</b> 76:8,13	<b>suppose</b> 24:9 114:9
<b>shares</b> 46:19,22,23 46:25 47:2,3,4 59:15,24 60:3 85:24 103:4 115:2 115:4 116:24,25 125:19 129:22	<b>SOUTHERN</b> 1:3 <b>speak</b> 7:15 10:17 10:19,20,23 11:3 23:10,13 27:15 28:11,14,16,19,22 29:12,20 30:3,10 61:5 136:20 137:7	150:25 <b>STASSEN</b> 4:9 61:23 74:19	<b>submitted</b> 52:7 134:2	<b>supposed</b> 154:18 <b>supposition</b> 25:6 26:21
<b>SHEET</b> 168:2	<b>speakers</b> 76:4,9	<b>state</b> 2:13 5:6,11,16 26:9 90:8 167:3,9	<b>Subscribed</b> 164:18 168:21	<b>sure</b> 14:7 19:14 25:18 31:14 32:23 37:20 54:18 69:16 80:17 86:18 91:5 91:5 92:23 95:2 105:14 116:9 117:14,17,18 123:17 138:5 142:14 159:5
<b>shells</b> 59:16	<b>speaking</b> 7:9 11:21 33:8	<b>statement</b> 27:4 47:16 53:13 56:20 56:25 57:17 83:7 133:13 151:5,7 154:5 161:23	<b>subsections</b> 62:22 62:23	<b>surface</b> 79:11
<b>she'd</b> 74:4	<b>special</b> 91:16,17	<b>States</b> 1:2 6:11 9:21 11:23 45:7 114:5	<b>subsequently</b> 141:7	<b>surname</b> 18:17
<b>She'll</b> 6:18	<b>specialized</b> 62:21	<b>steps</b> 70:4 127:23	<b>subsidiaries</b> 17:14 17:21 68:18,25 69:2 77:12,20,20 81:10,14,15,16,19 82:19,23 83:2 99:13 103:5,8 128:14 129:23 131:16 132:21,23 133:5,6,11,12,12 133:22 134:3,4 135:10,20,25 138:17,21 139:7 142:20,21,21	<b>surveillance</b> 48:21
<b>shirts</b> 155:23 156:10,21	<b>specific</b> 33:13 119:5 135:4 140:20 141:3	<b>stick</b> 162:13	<b>subsidary</b> 41:24 103:6 107:6,8	<b>sworn</b> 5:4,10 164:18 167:12 168:21
<b>short</b> 32:22 66:22 67:2	<b>specifically</b> 22:14 65:17 88:25 117:16 134:25 145:18 149:23	<b>stock</b> 46:2,16 50:24 51:6	<b>substance</b> 12:13 20:23 22:21 23:18 24:22 26:3 111:7	<b>system</b> 102:9,16 108:12 124:8
<b>shown</b> 145:2	<b>specifications</b> 158:19	<b>stop</b> 7:9,10 9:11	<b>substantial</b> 137:20	<b>systems</b> 102:14
<b>showroom</b> 158:21 159:9,12,16,19	<b>speculation</b> 20:19 73:4	<b>stops</b> 7:11	<b>Substrates</b> 58:18 59:18,24 60:22 61:10,16,17,22 62:3,7 97:6 124:25 125:10	<b>S-E-N-F-A</b> 60:4 <b>S.A</b> 1:9 2:8 3:12 4:4 13:7,19 14:25 15:5 16:5,13 17:12 18:24 19:8 19:12,18 21:2,22 22:4,13,15 29:19 29:22 30:14,18 31:7 32:5 34:4 36:12,14 37:24 38:8,14 41:24 45:23 46:12,14,15 47:23 48:4,19,22 49:14 54:22 58:3 62:18,24 63:3 64:17 65:15 66:8 67:24 69:12,14,18 69:22,25 70:15 71:12 72:3,8,9,16
<b>shows</b> 127:9 128:23 136:18	<b>spell</b> 13:15 18:14 40:9 41:19 43:2 58:23 93:13,18	<b>strategic</b> 64:10 74:24 75:18,23 76:2 78:16 91:14 135:23 137:10 138:18	<b>successor</b> 107:3,3 sued 42:8	
<b>sick</b> 66:20	<b>spelled</b> 58:19	<b>strategies</b> 132:10 132:22	<b>sufficient</b> 84:11	
<b>sign</b> 100:2	<b>spelling</b> 40:10 53:6 93:15	<b>strategy</b> 34:16 91:11 130:9,13,13 130:15,17,18,21 130:22,25 131:3,4 131:6,8,12,15 132:6,7,13	<b>suggest</b> 131:20	
<b>similar</b> 142:16	<b>spoke</b> 22:11,13,22	<b>Street</b> 4:7	<b>Suite</b> 3:16	
<b>similarly</b> 64:2,6 78:12	<b>spoken</b> 10:25 77:6 ss 167:4	<b>stricter</b> 48:23	<b>supervision</b> 57:9 57:10	
<b>simply</b> 59:21 61:17 108:10 136:17	<b>Stamford</b> 4:17	<b>strike</b> 13:5 32:2 65:4 108:25 113:24 115:24 120:2	<b>supervisory</b> 48:22	
<b>single</b> 17:20 18:4	<b>stamped</b> 115:15 144:9,12 147:11	<b>structure</b> 62:10		
<b>site</b> 154:2 163:17	<b>stance</b> 69:6			
<b>sites</b> 64:12 78:18,22 79:3,7	<b>standards</b> 157:11 157:16			
<b>situation</b> 70:10	<b>standpoint</b> 81:7 108:22			
<b>solely</b> 81:3	<b>stapled</b> 160:9			
<b>solutions</b> 91:12 151:3				
<b>somebody</b> 30:3 33:16				
<b>somewhat</b> 158:13				
<b>son</b> 66:19				
<b>sorry</b> 19:5 41:5				

72:24 73:9 74:15 75:8,11 78:4,21 79:20 81:11 85:22 85:23 89:6 90:17 92:11 94:2,12 95:19 96:2,20,22 97:7 99:11,14,24 100:11,19,22 101:9,22,24 102:2 102:7,13,19 104:8 105:11,17 107:23 108:11,13,24 109:4,11,20,23 111:12,17 112:8 112:12,14,19,23 118:19 121:24 122:5,12,21 123:6 123:7,10,12,18,23 124:2,6,7,13,15 124:19 125:12,16 125:20 126:2,7,8 126:13,20,21 127:3,10,21 128:24 129:9,22 130:8 131:11,15 132:16 133:11,22 134:2,7 135:8,18 135:24 136:8,16 136:18,22 138:4 142:13,18 149:9 149:13,19,22 154:8,12,16 155:17 159:18 <b>S.A.R.L</b> 13:21 14:20 39:2,3 <b>S.A.S</b> 13:19 38:24 39:6 48:2,11,24 62:7 86:2 121:3	130:6 132:4 144:2 144:5,16,18 <b>taken</b> 9:15 10:5 29:2 32:25 53:11 67:5 70:25 71:8 71:19 91:25 121:17 144:7 160:7 164:6 <b>takes</b> 69:5 100:8 <b>Talent</b> 76:16 <b>talk</b> 24:14 <b>talking</b> 14:6 24:15 71:21 72:23 73:2 92:12 98:14,15 130:12 <b>tapes</b> 41:18 42:2,5 42:8 79:9,10 <b>tasks</b> 73:11 <b>team</b> 154:24 155:4 155:8,8 <b>teams</b> 136:13 <b>technical</b> 53:24 58:18 59:18,23 60:11 61:9,16,17 61:21 62:3,6 97:6 156:6 <b>Technological</b> 124:25 125:10 <b>Technologies</b> 54:12 55:2 56:18 59:22 60:21,25 61:4,6 61:19 64:19,25 65:6,8 66:4 67:10 68:15 69:16 70:2 70:13,20,21 71:25 72:5 80:7 83:25 85:11 97:14 151:2 152:17 153:17,20 157:9,15 158:21 161:16 162:23 163:14 <b>Technology</b> 60:22 150:10 166:20 <b>TELEPHONE</b> 3:9 3:18 4:10,18 <b>tell</b> 9:16 81:21 <b>telling</b> 133:7	<b>temporary</b> 42:15 53:22 79:11 <b>term</b> 17:6,9 70:4 82:3 85:5 92:25 95:23 98:2,11 140:20 141:3 <b>terminate</b> 72:11 <b>terminology</b> 130:23 <b>terms</b> 47:11 48:17 57:4,9 82:8,11 87:3 104:21 131:2 <b>testified</b> 5:12 138:16 <b>testify</b> 9:19 10:6 110:22 118:17 119:7 <b>testifying</b> 32:12 <b>testimony</b> 21:25 22:4 29:22 33:9 56:9 128:3 164:6 167:13 <b>Textile</b> 58:20 <b>textiles</b> 1:12 28:6 53:24 60:11 115:8 116:2 118:13 165:13 <b>Thank</b> 5:24 41:10 <b>Thanks</b> 128:10 <b>theoretical</b> 102:10 <b>thing</b> 118:21 <b>things</b> 98:4 153:21 <b>think</b> 13:25 14:13 19:10 27:9 30:2,9 34:11 40:10 84:20 84:23 86:13 88:16 104:5 114:14,17 115:6 125:3 130:14 131:5 137:5 147:18,21 161:21 162:10 <b>thinking</b> 17:24 <b>third</b> 82:22 105:24 106:10,13 <b>thought</b> 53:3 101:3 136:19 <b>three</b> 35:11,14	63:16 90:23 <b>three-tiered</b> 45:14 <b>threshold</b> 106:20 <b>Thursday</b> 23:2 <b>time</b> 9:11,14 11:6 12:12 33:23 35:22 39:5 44:20 73:2 75:13 77:14 91:24 92:2 98:18 117:7 120:12 132:3 139:9 141:4 143:6 143:6 163:24 <b>times</b> 22:16,20 23:10,13,17 34:19 34:24 35:6,11 36:15 <b>Tina</b> 28:22 <b>title</b> 47:12 60:2 73:16 96:13 97:8 140:21 141:5 143:3,7 <b>today</b> 6:4,5,15 8:21 8:24 9:16,25 10:7 12:2,6 21:25 27:16 38:25 47:25 <b>today's</b> 22:8 28:12 28:17,20,23 116:7 145:3 <b>told</b> 12:9 133:4 <b>tomorrow</b> 6:4 8:22 8:23,24 9:3 <b>tonight</b> 9:10,14 <b>top</b> 55:8 62:9 63:25 79:13 128:13 141:18 145:21,23 146:4 153:3 <b>topic</b> 110:11,22 117:23 118:11,17 119:4,6,8 <b>topics</b> 67:17 110:8 136:4 <b>total</b> 45:15 <b>totally</b> 26:15 <b>transcribed</b> 67:14 <b>transcript</b> 164:5,8 <b>transcripts</b> 28:25 <b>transferred</b> 83:4	<b>translate</b> 27:5 57:3 77:21 138:8 152:4 153:5 157:24 158:4,25 159:4,6 162:9,19 <b>translated</b> 5:6 32:8 45:18 47:18 86:14 <b>translates</b> 152:7 153:7 <b>translating</b> 7:2,12 57:7 158:6,15 159:7 162:20 <b>translation</b> 34:11 86:17 108:20 115:11,18,19 140:21 143:12,13 143:18,19 144:10 144:11,13,14 146:18,25 147:8,9 147:12,13 151:8 151:10,19,23,25 152:10 161:21 165:16,21,22 166:5,7,13,18 <b>translator</b> 6:25 7:11 12:5,17,20 12:24 25:24 32:7 47:15,16,18 140:23 151:13 153:5 157:24 158:25 162:9,18 <b>trends</b> 157:8 <b>true</b> 49:17 50:11 56:20,25 57:8 64:16 65:21 83:7 83:13,14,14 85:12 117:4,13 151:7 153:12,25 154:2,5 155:25 163:21 164:8,12 167:13 <b>truth</b> 9:16 163:20 <b>truthfully</b> 9:19,25 <b>try</b> 7:19 9:13 102:19 <b>Tse</b> 28:14 <b>turn</b> 49:22 53:12 62:8 63:19 64:3
---	---	--	--	---

---

**T**

---

**T** 164:2 167:2,2  
**Table** 51:22  
**TAILORED** 1:5  
**take** 8:13,15 32:21  
66:21 70:4 73:9  
97:16 101:11  
110:2 121:15

**Technology** 60:22  
150:10 166:20  
**TELEPHONE** 3:9  
3:18 4:10,18  
**tell** 9:16 81:21  
**telling** 133:7

**thinking** 17:24  
**third** 82:22 105:24  
106:10,13  
**thought** 53:3 101:3  
136:19  
**three** 35:11,14

**total** 45:15  
**totally** 26:15  
**transcribed** 67:14  
**transcript** 164:5,8  
**transcripts** 28:25  
**transferred** 83:4

**truth** 9:16 163:20  
**truthfully** 9:19,25  
**try** 7:19 9:13  
102:19  
**Tse** 28:14  
**turn** 49:22 53:12  
62:8 63:19 64:3

79:12 82:14 96:4 110:3 116:20 117:21 119:3 134:15 140:11 141:16 157:4 <b>twice</b> 22:22 <b>two</b> 8:21 15:16 23:5 27:11 31:15 139:4 141:16 147:16 157:25 <b>type</b> 14:17,22 104:12 <b>types</b> 53:5 94:18 104:18 105:23 106:15 107:15 135:6 <b>T-A-P-E-S</b> 41:20	114:5 <b>units</b> 41:12 54:4,8 54:15 <b>unknown</b> 143:4 <b>Urbain</b> 63:15 <b>URL</b> 150:15 <b>use</b> 8:14 11:15 47:11 59:16 70:4 85:5 91:4,19 131:2 140:19 141:3 <b>Usually</b> 8:6	67:9,25 68:4 77:14 98:6 <b>Vossart's</b> 66:15	<b>we're</b> 31:14 78:11 80:24 143:25 151:24 <b>we've</b> 73:2 <b>WHEREOF</b> 167:19 <b>whichever</b> 84:22 <b>wider</b> 137:11 <b>WILLIAM</b> 4:9 <b>WILSON</b> 4:14 <b>withheld</b> 25:9 110:16 <b>witness</b> 5:9 12:15 21:17 26:12 27:2 32:12 33:19 54:16 54:19 56:14 57:13 101:2,5 110:18 117:9 122:24 125:3 130:20 140:2,4 144:20 147:4,17 151:13 152:22 153:3,14 153:22 157:17,19 165:4 167:10,14 167:19 168:4 <b>womenswear</b> 151:4 <b>wool</b> 47:4 53:24 58:12 <b>word</b> 32:17 55:17 64:2 83:18 122:15 158:8 <b>words</b> 20:22 69:21 96:9 152:17 <b>work</b> 11:9 13:3,6,9 16:4 20:7 21:5 36:6 44:9 87:8 124:7 136:14 151:22 152:9 <b>working</b> 70:11 75:21 139:14 <b>workings</b> 132:21 <b>works</b> 60:10 <b>workshop</b> 153:16 <b>world</b> 15:3 161:16 <b>Worldwide</b> 140:12 <b>world's</b> 151:3 162:24	<b>wouldn't</b> 93:15 154:21,24 <b>written</b> 10:24 65:24 130:24 142:5 <b>wrong</b> 55:25 56:5 <b>wrote</b> 79:4 142:3,4 <b>wstassen@foxrot...</b> 4:11 <b>Wujiang</b> 1:12 24:18 25:3 28:5,5 28:9,12 29:13,19 29:20,24 30:3,10 43:19 112:15,18 112:19,20,24 113:9,23,25 114:12,22,24 115:8 116:2 117:4 118:22 119:24 120:3,14,24 125:19,22 126:3 126:14,17,22,25 127:4,9,11,14,23 141:17,22 145:9 145:13,14 147:25 148:4,5 149:20,24 150:2 165:12 <b>Wujiang's</b> 114:19 <b>www.chargeurs-f...</b> 160:21 <b>www.chargeurs.fr</b> 49:16
<b>U</b> <b>ultimately</b> 146:9 <b>unclear</b> 26:9 <b>undergrad</b> 45:3,11 <b>underneath</b> 129:3 <b>understand</b> 7:18 7:24,25 9:15,18 9:22 10:23 16:25 17:2 22:3 25:17 28:4 32:14 34:17 54:23 67:7 73:5 85:2,8,10 92:5 95:2 98:16 104:16 121:19 123:15,17 138:14 155:5,6 156:2 <b>understanding</b> 34:8 <b>understood</b> 12:3 19:15 <b>undertake</b> 111:13 112:3,15 126:2,8 <b>undertaken</b> 142:14 <b>undertook</b> 111:9 112:23 121:25 127:24 <b>unit</b> 55:3 <b>United</b> 1:2 6:11 9:21 11:23 45:7	<b>V</b> <b>v</b> 1:8 168:3 <b>valid</b> 117:19 <b>value</b> 117:18 <b>Vanessa</b> 1:17 2:8 5:8,18 164:4,16 165:5 168:4,20 <b>VANNESA</b> 167:10 <b>various</b> 68:10,11 68:13,18,21 69:19 77:11,20 102:24 103:5 135:24 136:20 138:5,17 138:20 142:14,15 <b>Veratex</b> 1:13 4:13 24:17 109:21 113:22 114:10,12 <b>verbal</b> 6:18 <b>verbally</b> 6:20 <b>verifies</b> 133:24 <b>Veritext</b> 25:3 <b>version</b> 49:17 50:3 51:10 152:11 157:23 160:23,24 162:14,16 <b>versions</b> 150:19 158:2 <b>view</b> 81:22 82:5 <b>vision</b> 137:10,11 <b>visit</b> 78:22 <b>visits</b> 64:12 78:18 <b>voice</b> 7:4 <b>Vossart</b> 27:24 65:11,15,22,25	<b>W</b> <b>W</b> 164:2 <b>wait</b> 7:8,10,14 <b>want</b> 6:5 8:15 25:14 33:9 37:20 42:4 55:10 57:16 65:20 93:12 102:5 105:14 130:6,25 133:19 134:24 138:4 141:2 144:2 153:3 157:25 158:9,12 <b>wanted</b> 72:19 74:6 100:22 101:9,14 101:22 102:7 107:23 108:13 111:20 127:10 <b>wants</b> 26:8 92:22 100:6 104:10 <b>Washington</b> 4:16 <b>washroom</b> 8:15 <b>wasn't</b> 30:6 71:13 78:7 <b>way</b> 10:7 68:8,20 84:10,15,22 102:12,19 113:4 131:10 132:15 142:17 161:5 167:18 <b>ways</b> 92:9 108:23 109:4 129:8 <b>website</b> 49:16 150:11,14,16,19 150:20 152:11 154:11 155:2,12 160:16,20,23,25 163:3,5,18 166:20 166:22 <b>week</b> 11:15 <b>Welcome</b> 92:4 <b>went</b> 155:11 <b>we'll</b> 9:13 143:24 160:2 162:13	<b>X</b> <b>X</b> 165:2 166:2	<b>Y</b> <b>year</b> 34:20,23 35:8 45:15,20,21 67:19 68:8 <b>years</b> 10:10 34:21 39:10 45:15,22 <b>yesterday</b> 149:21 <b>York</b> 1:3,19,19 2:10,10,14 3:8,8 3:17,17 5:6,12 23:19,22 75:6 158:22 159:20



167:3,9	20th 4:7	34 58:18 59:6		
<b>0</b>	2000 4:7	345 2:9 3:7		
06901 4:17	2005 44:17	35 58:19 59:6		
<b>1</b>	2006 39:10	<b>4</b>		
1 21:11,12 110:2	2010 44:8,18	4 118:9 139:18,19		
117:20 119:4	2014 142:10	140:5 165:17		
165:8	2016 120:9 148:9	42 10:10		
1:12 91:24	2017 33:22 34:22	49 165:10		
10 9:5,6,7 15:20	35:7,8,9,17,20,21	<b>5</b>		
160:9,16,19	35:23 36:16,22	5 143:9,11,25 144:8		
166:22	37:8,14,17,22	144:9,17 148:21		
10:00 9:4	43:12 48:8 49:4	161:2 165:5,21		
100% 121:5,10	64:16 65:10,15	52 55:5		
101 3:16	78:23 79:17	5754 1:8		
1010 4:16	107:19 120:9	58 79:17		
10154-1895 3:8	148:9 158:22	<b>6</b>		
10178 3:17	165:10	6 143:10,17 144:8		
108 82:14	2018 1:18 2:4 48:8	144:12,17 148:21		
112 30:17,23	50:6 67:22 107:20	166:5		
115 165:12	164:7,20 167:21	6/18/18 168:3		
131 140:11 141:11	168:22	6:03 163:24		
132 5:20	203-388-9100 4:18	<b>7</b>		
133 141:17	21 165:8	7 146:13,14 148:21		
139 165:17	21.21 116:25 117:5	166:9		
143 165:21 166:5	212-13 50:7	7.2 52:4		
145 140:6	212-407-4189 3:9	7.3 52:4		
146 79:12 83:20	212-878-7900 3:18	75116 30:17,23		
166:9,14	215.299.2000 4:10	77 51:25		
15 15:21 53:16	218 128:12	78.79 116:23 117:5		
150 166:19	21843 1:25 168:4	<b>8</b>		
16 11:7 53:13,14,15	22 147:11	8 146:13,21 147:10		
53:17,18	23 50:6 110:4,5	148:22 166:14		
160 166:22	119:4	8.1.2 128:18		
17 1:8	24 144:13	80 62:8		
1700 3:16	<b>3</b>	83 63:19		
18 1:18 2:4 164:7	3 115:6,7,14 116:20	84 63:25 74:18 78:9		
19103-3222 4:8	117:23 118:11,21	86 96:4		
1999 45:10,21	151:11,15 165:12	<b>9</b>		
<b>2</b>	30(b)(6) 1:17 2:7	9 150:8,9 166:19		
2 49:2,3 116:11	30/04/2014 139:20	9:14 2:5		
117:21,25 118:3,7	165:18	92200 5:20		
118:8 128:6,8	300,000 43:9			
165:10	3069 119:20,25			
2:17 92:2	120:4 145:18			
20 23:23 66:24	146:9 148:19			
	31 79:16			